

77 03452

ENVIRONMENTAL IMPACT REPORT
ALAMEDA COUNTY SOLID WASTE MANAGEMENT PLAN

Note: The Solid Waste Management Plan, dated December 8, 1975,
is contained in a separate volume.

Refuse disp. Alameda co
Environ impact studies

INSTITUTE OF GOVERNMENTAL
STUDIES LIBRARY

AUG 23 1977

UNIVERSITY OF CALIFORNIA

no slip

Alameda County Planning Department
[Alameda County Solid Waste Management
Plan Advisory Committee]
Alameda County Solid Waste Management
Plan Technical Advisory Committee

DEC 8 1975



Digitized by the Internet Archive
in 2024 with funding from
State of California and California State Library

<https://archive.org/details/C124900636>

ALAMEDA COUNTY SOLID WASTE MANAGEMENT PLAN

ENVIRONMENTAL IMPACT REPORT

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
IX Environmental Impact Report	
A. Introduction	IX-1
B. Project Description	IX-1
C. Description of the Environmental Setting	IX-1
D. Regional Coordination	IX-3
E. Legal, Policy, or Institutional Constraints	IX-5
F. Environmental Impact	IX-6
G. Comments Received on the Draft Environmental Impact Report	

IX. ENVIRONMENTAL IMPACT REPORT

A. Introduction:

The proposed Alameda County Solid Waste Management Plan will not have a significant detrimental effect on the natural and social environments in the County and the Bay Area. The Plan was developed in accordance with the mandates of SB-5 and in coordination with cities, special districts, and the industry. Changes to the existing system are required by SB-5 and the proposed Plan policies.

The Environmental Impact Report was prepared by the Alameda County Planning Department in accordance with the requirements of the Environmental Quality Act of 1970 (CEQA), State Guidelines for the Implementation of the Act, and revised Alameda County Guidelines dated February 7, 1974.

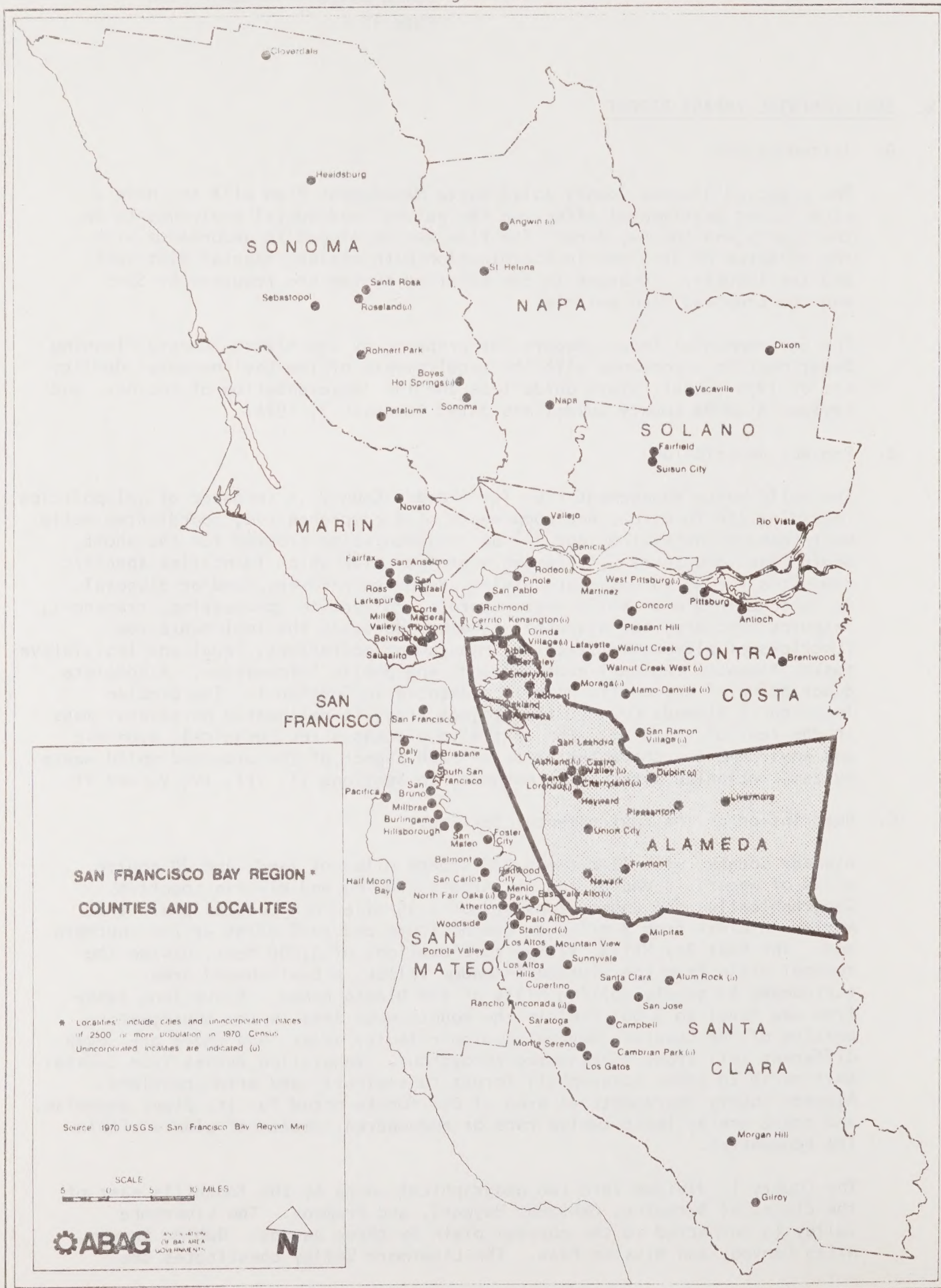
B. Project Description:

The Solid Waste Management Plan for Alameda County is composed of (a) policies regarding the functions and components of a comprehensive, coordinated solid waste management system, and (b) an implementation program for the short, medium and long terms. It is not a project plan which identifies specific new sites for solid waste processing, resource recovery, and/or disposal. It is concerned with solid waste storage, collection, processing, transport, resource recovery, and disposal; it also addresses the implementation functions of plan administration, management/operations, legal and legislative tasks, finance, regional coordination, and public information. A complete description of the entire Plan is presented in Section I. The precise location of Alameda County, the project area, is delineated on several maps in the text of the plan. The text also discusses the technical, economic and environmental characteristics of each aspect of the proposed solid waste system, including alternative methods, in Sections II, III, IV, V, and VI.

C. Description of the Environmental Setting:

Alameda County, with 13 cities, 735 square miles of land, and 77 square miles of water, is one of the Bay Area's growing and diverse counties. Geographically, the County consists of a 35-mile long coastal plain that varies in width from 3 miles at the northern end to 8 miles at the southern end. The East Bay Hills, rising to elevations of 3,000 feet, divide the coastal plain from the Livermore-Amador Valley, a bowl-shaped area surrounded by gently rolling hills of the Diablo Range. Elevations range from sea level to 3,807 feet in the mountainous area in the southeastern portion of the County. Several geologic faults exist, and there are seven different soil types represented throughout. Vegetation varies from coastal salt marsh to green sclerophyll forest to semi-arid and arid grassland. Alameda County represents an area of California noted for its plant endemism, and there are at least twelve rare or endangered species of plants within its boundaries.

The County is divided into two geographical units by the foothills east of the cities of Berkeley, Oakland, Hayward, and Fremont. The Livermore Valley is connected to the coastal plain by three passes: Dublin Canyon, Niles Canyon, and Mission Pass. The Livermore Valley constitutes the



eastern portion of the County, has a small but rapidly growing population, and still supports a significant amount of agricultural activity. While the major portion of population and urbanization occurs in the northern cities of Alameda County, the fastest growth is in the southwestern portion of the County, from San Leandro to Fremont. Rapid population increases have also been occurring in the Livermore-Amador Valley.

Alameda County had a January, 1975, estimated total population of 1,142,000 people distributed within four Planning Units. The Central Metropolitan Planning Unit includes the cities of Albany, Berkeley, Piedmont, Oakland, and Emeryville, with an estimated January, 1975, population of 576,000 people representing 50.5 percent of the total population of the County. It includes 51,030 acres of land. South of the Central Metropolitan Planning Unit, and west of the hills that separate the western portion of the County from the Livermore-Amador Valley, are the Eden and Washington Planning Units.

Eden Planning Unit includes the cities and unincorporated areas of Hayward, San Leandro, Castro Valley, San Lorenzo, and Rural Recreation Areas 1 and 2. The area has an estimated January, 1975, population of 276,100 people, representing 24.2 percent of the population of the County. Eden Planning Unit encompasses 76,430 acres of land.

Washington Planning Unit, which includes the cities of Fremont, Newark, and Union City, and Rural Recreation Area 3, has an estimated January, 1975, population of 182,900 people, representing 16.0 percent of the population of the County. Washington Planning Unit has a total of 79,280 acres.

The Livermore-Amador Valley Planning Unit encompasses the eastern portion of the County, and includes the cities of Livermore and Pleasanton, and unincorporated areas of Dublin, Sunol, and Rural Recreation Areas 4 and 5. This valley is 264,530 acres in size and has an estimated January, 1975, population of 106,400 people, representing 9.3 percent of the population of the County. Each of these four planning units is characterized by unique natural features. Land use types, population composition, and characteristics vary in each of the four areas.

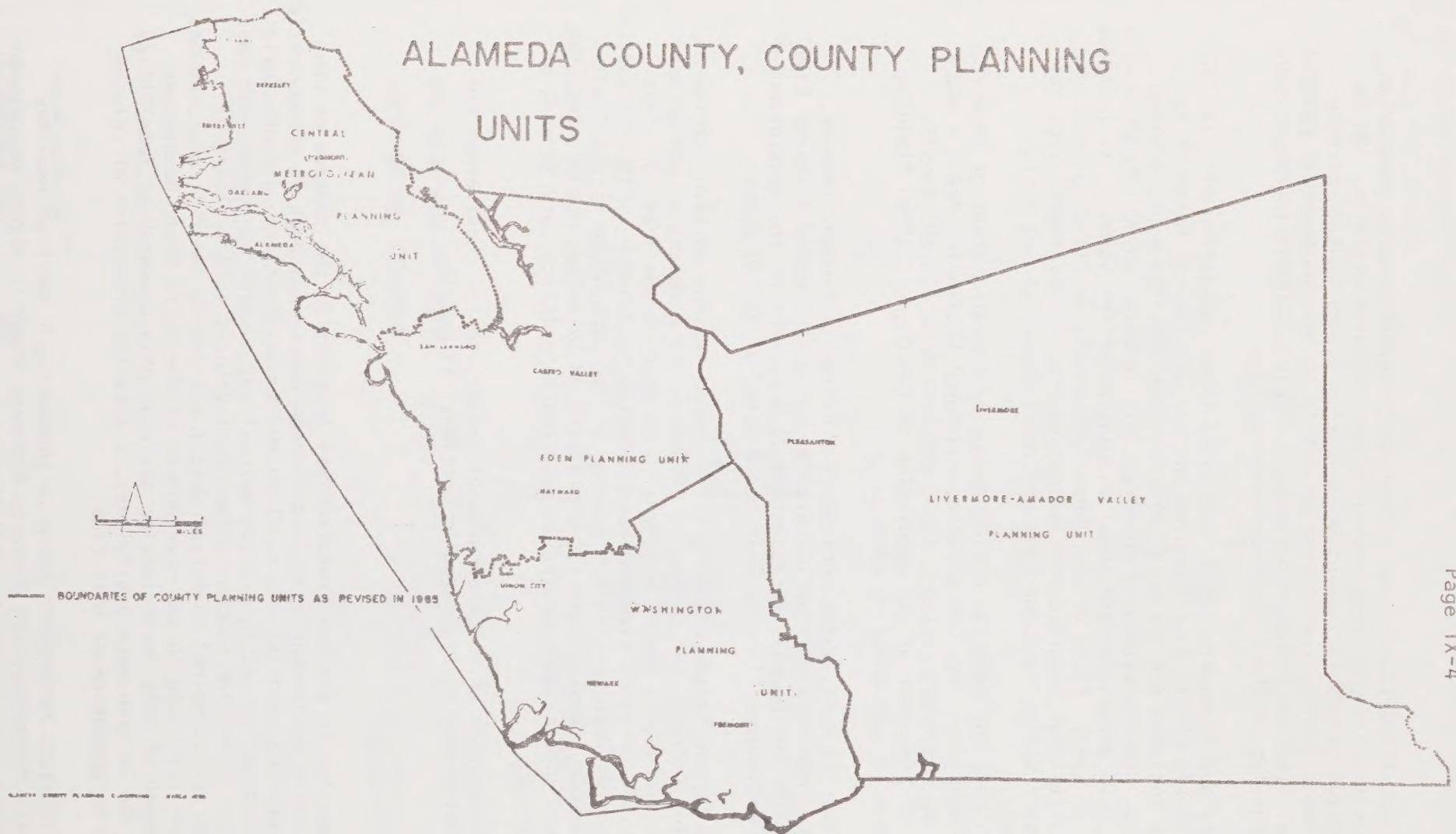
A thorough description of the natural environment and its constraints for solid waste management is presented in Sections III and IV.

D. Regional Coordination:

All of the counties in the San Francisco Bay Area are in the process of preparing solid waste management plans; and Alameda County has been in communication with its neighboring counties--Santa Clara and Contra Costa--to discuss solid waste plan coordination and future subregional solid waste management options. Energy recovery, composting demonstration, agricultural land reclamation (sewage sludge and composted municipal waste), and remote landfill are concepts which have been discussed in the development of the Solid Waste Management Plan. Since much of this investigation has been of a research or feasibility study nature and is also very preliminary, a detailed discussion of related impacts would be premature at this time.

The State Solid Waste Management Board is conducting a San Francisco Bay Area Solid Waste Management and Resource Recovery Study to determine relevant data of all solid waste generation and disposal activities in the San Francisco Bay Area to provide for enlightened decision-making based on facts. The

ALAMEDA COUNTY, COUNTY PLANNING UNITS



Study will determine the most promising alternatives superior to the present practice of landfilling. The Study will make specific recommendations to the legislature identifying technical risk, candidate system design for each area as defined, financing techniques appropriate, institutional or jurisdictional mechanism needed, and required legislation.

The San Francisco Bay Area Solid Waste Management and Resource Recovery Study could have a significant impact on Alameda County in that it could facilitate the implementation of the Plan's goals of 67% resource recovery by the early 1980's and 92% in 1990. Alameda County and the State Solid Waste Management Board will continue close coordination on developing large-scale resource recovery programs through this study.

E. Legal, Policy, or Institutional Constraints:

The existing legal and institutional environments in Alameda County will present constraints on plan implementation; and existing policies promulgated by Federal, State, regional, and local governmental agencies will affect both short- and long-term solid waste management programs. Existing policies and regulations relating to the proposed Solid Waste Management Plan are covered in Section VII. The County-wide Solid Waste Management Plan is a comprehensive plan for the entire County including the cities, sanitary districts, and unincorporated communities affecting the public and private sectors. The SB-5 mandate will require a change in some existing institutions and policies.

The Plan is to be adopted by a majority of the cities having a majority of the population. Thus, plan implementation is to occur with the majority's approval.

The implementation of the Alameda County Solid Waste Management Plan will be influenced by the following constraints:

- . County ordinances apply only to the unincorporated area.
- . Sixteen separate jurisdictions are presently responsible for the provision of collection and disposal service to County residents and commercial establishments.
- . Local ordinances may seek to restrict use of facilities, such as disposal sites, to certain County residents or may require that a facility be located within a specific number of miles from the city boundaries. Such parochial restrictions are contrary to a coordinated County Solid Waste Management Plan.
- . State regulations, policies, and programs delineate minimum standards and criteria for solid waste management, and the County's Solid Waste Management Plan must be consistent with these.
- . Solid waste management may not be considered a high priority public service by many local jurisdictions. The "out-of-sight, out-of-mind" philosophy prevails in some communities.
- . Refuse collection and disposal is dominated by the private sector in Alameda County.

- . A majority of the franchises (12) are held by one company.
- . There is an apparent reluctance towards public financing of solid waste facilities.
- . There is no central coordinating agency for environmental, health, and engineering problems of the solid waste system in Alameda County with the authority to act for, and in behalf of, all of the jurisdictions (16) responsible for solid waste services.
- . There is an established practice to pay for solid waste management through user charges (directly) and property taxes (indirectly).
- . There is the tendency towards decentralization of solid waste management activities which would not promote well-coordinated implementation of the Plan.
- . Not all aspects of solid waste management can be controlled at the local level. Hazardous waste transport and disposal are examples.
- . The private sector has usually been reluctant to reveal cost/revenue data on their operations in Alameda County.
- . Each jurisdiction establishes collection rates chargeable to customers in its area. The rate review and franchise negotiation procedure is presently a function of each jurisdiction despite the establishment of the Joint Refuse Rate Committee.
- . An adequate comprehensive, updated data base on the solid waste management system in Alameda County is lacking.

The Plan document has identified these constraints and recommended policy and tasks to minimize their effects.

F. Environmental Impact:

The overall goal of the Solid Waste Management Plan is the provision of an environmentally safe, efficient, and economical solid waste system to County residences, businesses, institutions, and industries while, at the same time, decreasing the quantity of materials in the waste stream through resource recovery and source reduction efforts. It seeks to promote the conservation of resources and the minimization of adverse impacts on the natural and social environments. Consequently, the Solid Waste Plan is anticipated to have a significant beneficial impact over the long term when full resource recovery is achieved and implementation mechanisms are functioning smoothly.

The environmental impact of the proposed Plan during the short term (present to 1980) will depend on the changes which will be integrated into the present system such as resource or energy recovery and new or centralized landfill operations, new legislation (such as container bills to reduce litter and encourage use of returnable/reusable containers, local ordinances prescribing standards for solid waste facilities, and joint powers agreements), and through construction of facilities for transfer, processing, recovery, and disposal of wastes. Financial impacts are inevitable, because local governments will

increasingly participate in solid waste management largely through personnel time commitments, franchise review procedures, monitoring and enforcement activities, and public information, etc. A secondary impact of some changes in the waste system might be added costs to the residential and commercial customers. However, waste system evaluations scheduled in the Implementation Program may reveal areas of substantial cost savings. Social impacts in the short term are minimal; concepts such as source separation and recycling, source reduction, and change in consumer habits, which could reduce the quantities of wastes generated by residents and businesses, signal mid- and long-term community impacts. In terms of environmental or natural resources, a degree of conservation will be achieved through voluntary recycling efforts, materials separation/recovery, and the greater utilization of recycled products.

1. Adverse Environmental Effects

Any adverse environmental effects will be related to the seven elements of Action Program 1 - 1976-1980. Each element of the program deals with a different but related aspect of waste management. Some elements of the program may have no impact or, for the short, medium, and long ranges, may have impacts that are obscure and will be dealt with in separate project EIR's. This EIR may not be used to exempt such proposed facilities from further detailed environmental assessment.

Element 1 - Plan Administration. No adverse impacts. Establishment and acceptance of standards and regulations on operational aspects of solid waste management would be expected to have a beneficial impact through improving operations and preventing land, air, and water pollution.

Element 2 - Management Operations. In general, minimal adverse impacts are anticipated; these would be associated with only ten percent resource recovery being achieved and with continued landfill disposal in the short term. Cooperation between government and industry should foster beneficial impacts with minimal environmental disruption.

Element 3 - Legal and Legislative. No adverse impacts. New ordinances and regulations would have beneficial impacts by reducing litter and promoting environmental controls on operations.

Element 4 - Finance. No adverse impacts ascertainable at this time. Plan implementation will seek to balance system financial costs with social and environmental benefits.

Element 5 - Regional Coordination. No adverse impacts. The flow of solid waste does not respect jurisdictional boundaries; hence, coordination on common problem areas can lead to system efficiencies and greater control over system operations, especially with hazardous wastes and resource recovery facilities, for example.

Element 6 - Public Information. No adverse impacts other than the proliferation of printed material which eventually enters the solid waste stream. Otherwise, public education programs would not have adverse environmental impacts. The educational benefit of the printed literature should lead to a reduction of Solid Waste, thus mitigating the effects of the printed material.

Element 7 - Research and Planning. No adverse impacts.

2. Mitigation Measures to Minimize Adverse Impacts

The County-wide Solid Waste Management Plan does not recommend specific sites for facilities. Consequently, until such facilities are designed and submitted to local government for approval, it is premature to discuss mitigation measures. During plan implementation when facility plans are reviewed, measures to reduce any adverse impacts will be required.

In general, the Plan attempts to reduce significant environmentally adverse impacts traditionally associated with solid waste handling and disposal: air pollution, water pollution, vector problems, and wasting of material resources. Mitigation measures include the reduction of the number of landfill sites, materials recovery through voluntary recycling, source separation and front-end separation, comprehensive regulation and monitoring of all aspects of the system, continuing solid waste planning functions at the County-wide level with the participation of the local jurisdictions and private industry, and eventually full-scale resource recovery including energy recovery.

3. Alternatives

Section V of the Plan, "Evaluation of Solid Waste Management Technology," includes the solid waste management system flow charts depicting alternative systems for handling Alameda County's solid wastes in succeeding planning periods -- 1976 to 1980, 1981 to 1990.¹ (See pages V-40 to V-47.) The estimated annual operating costs for these alternatives are diagrammed on pages VI-32 to VI-39.

In the short-term planning period, Alternatives 1980-A and 1980-C are similar in that both achieve 67 percent resource recovery of wastes generated in the County as a whole. Both alternatives include the following activities: collection, transfer, materials recovery, energy recovery, long-haul transportation, and disposal. The difference is that the 1980-A Alternative depicts the San Francisco Bay Delta Resource Recovery Demonstration Project in operation, utilizing a portion of the City of Berkeley's waste. These two proposed alternatives exceed the State Solid Waste Management Board's criteria for 25 percent resource recovery, and they begin to meet the Plan's goal of maximum resource recovery with minimum waste disposal. Alternative 1980-B is much less successful in achieving the goals of the Plan and the State Solid Waste Management Board. It differs from 1980-A and 1980-C in that energy recovery is excluded. Only seven percent resource recovery is achieved on a County-wide basis.

In the long-term planning period, Alternative 1990-A (full-scale Bay Delta system) achieves 41 percent resource recovery. Because of the existing difficulties in implementing the demonstration project and the low percentage of recovered materials, in comparison with the other alternatives, 1990-A does not appear to be the most feasible alternative. The other three alternatives consist of the same functions (collection, transfer, materials recovery, energy recovery, long-haul transport, and

¹ Policy recommendations for 1990-2000 included in Section VIII.

disposal)); but these are applied to different parts or planning units in the County. Alternative 1990-C achieves what is determined to be the maximum feasible resource recovery--92 percent. The proposed Plan does not, at this time, recommend which of the four long-term alternatives is to be implemented. This is to be a function of the agency and advisory committees who are responsible for plan implementation and future solid waste planning. Testimony at public hearings by the County and cities will assist in these deliberations.

The economic impact of these short- and long-term alternatives is discussed on pages VI-29 and VI-30. Revised Table VI-7 is repeated in this environmental impact report to elucidate the financial costs which would have to be borne by the social environment--County residents and businesses.

REVISED SUMMARY OF COST ESTIMATES OF ALTERNATIVE SOLID WASTE
MANAGEMENT SYSTEMS: ALAMEDA COUNTY, 1975, 1980 and 1990

System	Total Capital Cost	New Capital, Required ¹	Annual Operation Cost	Average Cost Per Ton
1975 (Existing)	\$ 18.76M	\$ 0.00M	\$43.10M	\$39.78
1980 - A	84.50M	65.74M	49.73M	41.77
1980 - B	36.13M	17.37M	51.25M	43.05
1980 - C	85.88M	67.12M	49.32M	41.42
1990 - A	76.52M	57.76M	73.64M	50.93
1990 - A2	101.93M	83.17M	64.79M	44.81
1990 - B	98.96M	80.20M	59.75M	41.33
1990 - C	133.38M	114.62M	60.79M	42.05
1990 - D	120.58M	101.82M	60.41M	41.78

¹Total capital less \$18.8 million in the existing system assumed to continue in service.

The "no project" alternative is impossible, because State law requires that the counties produce solid waste management plans which present a system to handle County solid wastes in an environmentally sound manner including significant resource recovery. The existing system is incapable of handling the projected quantity of wastes and does not minimize adverse environmental impacts associated with the landfill disposal system.

4. Relationship Between Short-Term and Long-Term Uses

The Plan seeks to reduce adverse environmental impacts associated with waste management through comprehensive planning and regulation and through intelligent, informed decision-making during plan implementation. No adverse environmental impacts are anticipated as a result of the adoption of the plan policies and implementation program.

5. Irreversible Environmental Changes

Until resource recovery facilities (materials and energy) are on-line, the resources in solid waste will continue to be lost or to pollute the environment. When specific facilities are designed, then any irreversible environmental changes resulting from these projects can be ascertained. Any irretrievable commitments of resources can then be evaluated to assure that such consumption is justified.

6. Growth-Inducing Impact

Historically, the adequacy of solid waste disposal facilities has not specifically or directly affected population growth in that, unlike other public utilities and public services, solid waste services have not generally placed a constraint on population growth. Traditionally, the environmental impact review and zoning review processes have focused on the adequacy of roads, sewer connections or system, public water supply availability, fire protection services, and the project's conformance to existing ordinances. But with the implementation of the Plan, consideration of solid waste generation and its impact on local solid waste facilities could occur in many jurisdictions and affect growth in specific localities.

Implementation of a solid waste system with adequate capacity to handle wastes generated by projected future populations is an important goal of the Plan. It is unlikely that the system, in the long term, would constrain growth. If an adequate system was available, Alameda County could be attractive to industry and developers; the growth-inducing impact is likely to be indirect. If sophisticated resource recovery technology is implemented in Alameda County, the generation of recovered materials and/or energy might stimulate local industries to expand or encourage other industries to locate in the County. Such beneficial impacts should be evaluated for their growth-inducing potential with the submission of solid waste project proposals.

7. Energy Consumption

The overall thrust of the Plan Policies is to promote energy conservation through greater utilization of secondary materials, source reduction of wastes, and resource recovery. While energy would be consumed in transportation vehicles, a front-end materials recovery system, or an energy recovery facility, consumption would have to be less than the

amount generated in order to be consistent with Plan Policies. Proposals for resource recovery facilities can be evaluated in terms of energy consumption when presented to the County.

ORGANIZATIONS AND PERSONS CONSULTED:

Solid Waste Management Plan Advisory Committee

• Board of Supervisors:

Sara Conner
Chuck Corica, Vice-Chairman
Walter I. Dahl
Clifford Heisterberg
Franklin Hurlbut
Gus Levy
Albert C. Massa
Carl Olsen
Ariel Parkinson
W. L. Williams

• Mayors' Conference:

Wallace Fox
William Herlihy
Fred Maggiora
Donald G. Miller
Gail Steele

• Industry:

Ed DePaoli
Lee Hertzberg
Leroy Martin
Lou Schmitz/Tom Meichtry
Gary Schnitzer

• Comprehensive Health Planning Council:

Lois Hill
W. Wilson Sampson, Ph.D.
Hiram Wolch, Ph.D., Chairman

Solid Waste Management Plan Technical Advisory Committee

• County Planning Staff:

William H. Fraley, Planning Director
Betty Croly, Asst. Planning Director
Ron Eggers, Planner III
Susan Hootkins, Planner II
Steve Richards, Planner II
Lynne Vanlandingham, Recording Secretary
Lydia Castellanos, Recording Secretary

• County Environmental Health Planning:

Gerald Winn

• County Public Works:

Paul Lanferman
Steve Marsden
Jessie Cambra

• City Managers/Administrators:

Bob Guletz, Albany

• City Planning Departments:

Bill Duval, Berkeley
Doug Eads, Fremont
Ken Ahlquist, Hayward
Charles Cashmark, Newark
Marc Herbert, Oakland, Chairman
Martin Vitz, San Leandro

ORGANIZATIONS AND PERSONS CONSULTED (Continued):

Solid Waste Management Plan Technical Advisory Committee (Continued)

- City Public Works Departments:
 - Jerry Eichelberger, Alameda, Vice-Chairman
 - Leo Thomason
 - A. H. Anderson, Albany
 - Richard Gazlay, Berkeley
 - Edward Steffani, Emeryville
 - Larry Milnes, Fremont
 - Gerald Gifford, Hayward
 - Randy Werner, Livermore
 - Ralph Williams, Oakland
 - Robert Bauer, Piedmont
 - John Bowling, Pleasanton
 - Bob Lawrence, San Leandro
 - Ralph E. Kirkup, Union City
- Pacific Gas and Electric Company:
- Association of Bay Area Governments:
 - Yvonne San Jule
- Oakland Scavenger Company:
 - Lou Schmitz
 - Tom Meichtry
- State Health Department:
 - Earl Mortenson
- Berkeley Health Department:
 - Martin Gerber
- Valley Community Services District:
 - Neil Long
- State Department of Water Resources:
- East Bay Municipal Utility District:
 - David M. Hill
- U. S. Soil Conservation Service:
 - Denis Nickel (1973-74), Bob Roan (1975)
- Water Quality Control Board:
 - Harold Singer

APPENDIX
EIR REFERRAL LIST

Alameda County Officials

Board of Supervisors
1221 Oak Street
Oakland, CA 94612

Planning Commission
399 Elmhurst Street
Hayward, CA 94544

Solid Waste Management Plan
Advisory Committee*
c/o H. Wolch, Chairman

Airport Land Use Commission
399 Elmhurst Street
Hayward, CA 94544

Parks Advisory Commission
399 Elmhurst Street
Hayward, CA 94544

Sand and Gravel Committee
c/o Pleasanton Planning Director
200 Bernal Avenue
Pleasanton, CA 94566

Development Planning Division
399 Elmhurst Street
Hayward, CA 94544

Zoning Administrator
399 Elmhurst Street
Hayward, CA 94544

Local Agency Formation Commission
Roland Mayne
County Administrator's Office
1221 Oak Street
Oakland, CA 94612

Road Department
Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

Flood Control
Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

Alameda County Officials

Building Official
Public Works Agency
399 Elmhurst Street
Hayward, CA 94544

Health Care Services Agency
Environmental Services
499 - 5th Street
Oakland, CA 94607

Sheriff's Department
Room 104, Court House
1225 Fallon Street
Oakland, CA 94612

Agricultural Commissioner
Room 207
224 West Winton Avenue
Hayward, CA 94544

Alameda County Comprehensive
Health Planning Council
499 - 5th Street
Oakland, CA 94607

Office of Emergency Services
2700 Fairmont Drive
San Leandro, CA 94578

Cities and Local Districts

Alameda City Manager
City Hall, Room 135
Santa Clara and Oak Streets
Alameda, CA 94501

Albany City Manager
City Hall
1000 San Pablo Avenue
Albany, CA 94706

Berkeley City Manager
City Hall
Allston Way and Grove
Berkeley, CA 94700

* See list on previous pages.

Cities and Local Districts (Continued)

Emeryville City Manager
City Hall
2449 Powell Street
Emeryville, CA 94608

Fremont City Manager
City Hall
39700 Civic Center Drive
Fremont, CA 94536

Hayward City Manager
City Hall
22300 Foothill Boulevard
Hayward, CA 94541

Livermore City Manager
City Hall
2250 First Street
Livermore, CA 94550

Newark City Manager
City Hall
37101 Newark Boulevard
Newark, CA 94560

Oakland City Manager
City Hall
14th and Washington Streets
Oakland, CA 94612

Piedmont City Manager
City Hall
120 Vista Avenue
Piedmont, CA 94611

Pleasanton City Manager
City Hall
200 Bernal Avenue
Pleasanton, CA 94566

San Leandro City Manager
City Hall
835 East 14th Street
San Leandro, CA 94577

Union City City Manager
City Hall
1154 Whipple Road
Union City, CA 94587

Cities and Local Districts (Continued)

Valley Community Services
General Manager
7051 Dublin Boulevard
Dublin, CA 94566

Oro Loma Sanitary District
General Manager
P. O. Box 95
San Lorenzo, CA 94588

Castro Valley Sanitary District
General Manager
21040 Marshall Street
Castro Valley, CA 94546

Joint Refuse Rate Committee
c/o Jennings Smith
Oakland City Hall
14th and Washington Streets
Oakland, CA 94612

Solid Waste Management Plan
Technical Advisory Committee*
c/o M. Herbert, Chairman

Alameda County Sewerage Advisory Committee
c/o Oro Loma Sanitary District
Gail Stanton
P. O. Box 95
San Lorenzo, CA 94588

East Bay Municipal Utility District
P. O. Box 24055
Oakland, CA 94623

Ms. Sally Mank
Office of Community Development
Fremont Civic Center
Fremont, CA 94538

Congress of Valley Agencies
2250 First Street
Livermore, CA 94550

Mr. Wayne Bruce, Manager
East Bay Dischargers Study
Hayward Civic Center
Hayward, CA 94541

*See list of previous pages.

Cities and Local Districts (Continued)

Mr. Nat Daniels
Union Sanitary District
4057 Baine Avenue
Fremont, CA

Mr. George Gardner
City Administrator
City of Piedmont
City Hall
Piedmont, CA 94611

Mr. Roy Nakadegwa
Richmond City Hall
27th and Banett Streets
Richmond, CA 94804

Airports

Port of Oakland
66 Jack London Square
Oakland, CA 94607

Airport Manager
Hayward Airport
20301 Skywest Drive
Hayward, CA

Commanding Officer
Alameda Naval Air Station
Main and Atlantic Streets
Alameda, CA 94501

Airport Manager
Livermore Airport
City Hall
2250 First Street
Livermore, CA 94550

Federal, State, Regional

State Clearinghouse
Office of the Governor
Office of Planning and Research
1400 - 10th Street
Sacramento, CA 95814

State Solid Waste Management Board
Room 1335, Resources Building
1416 Ninth Street
Sacramento, CA 95814

Federal, State, Regional (Continued)

Department of Transportation
T. R. Lammers
Rincon Annex
San Francisco, CA 94119

Air Resources Board
1025 "P" Street
Sacramento, CA 95814

Air Resources Board
William Lockett
Chief Evaluation and Planning
1025 "P" Street
Sacramento, CA 95814

Department of Agriculture
State Board of Agriculture
1220 North Street, Room 111
Sacramento, CA 95814

Mr. Ron Brill
San Francisco Bay Area Council
348 World Trade Center
San Francisco, CA 94111

Department of Water Resources
1416 - 9th Street
Sacramento, CA 95814

Division of Mines and Geology
Ferry Building
San Francisco, CA

Resource Conservation District
P. O. Box 672
Livermore, CA 94550

California Department of Transportation
Division of Aeronautics
Sacramento Executive Airport
Sacramento, CA 95822

Contra Costa County Planning Department
County Office Building
Martinez, CA

Santa Clara County Planning Department
County Administration Building
70 West Hedding
San Jose, CA

Federal, State, Regional (Continued)

Association of Bay Area Governements
Hotel Claremont
Berkeley, CA 94705

Metropolitan Transportation Commission
Hotel Claremont
Berkeley, CA 94705

Bay Area Sewage Services Agency
Hotel Claremont
Berkeley, CA 94705

Bay Area Rapid Transit District
800 Madison Street
Oakland, CA

East Bay Regional Park District
11500 Skyline Boulevard
Oakland, CA

Bay Area Air Pollution Control District
939 Ellis Street
San Francisco, CA 94109

Bay Conservation & Development Commission
30 Van Ness Avenue
San Francisco, CA

Water Quality Control Board
1111 Jackson Street, Room 6040
Oakland, CA

Santa Clara County Health Department
2220 Moorpark
San Jose, CA 95128

Mr. W. J. Kochelman
U.S. Geological Survey
345 Middlefield Road
Menlo Park, CA 94025

Mr. Warren Terriberry
Planning Departmnet
Santa Clara County
County Administration Building
San Jose, CA

Mr. Stan Snock
Public Works Department
Cith Hall
City/County of San Francisco
San Francisco, CA

Federal, State, Regional...(Continued)

Mr. Ray Foreaker
Public Works Director
Marin County
County Administration Building
San Rafael, CA

Mr. Sal Armogida
City Engineering Department
City Government Center
Redwood City, CA 94063

Mr. David Hubbell
Solano County Planning Department
Courthouse
Fairfield, CA

Mr. George Hersh
State Water Resources Board
P. O. Box 100
Sacramento, CA 95801

Contra Costa County
Public Works
Martinez, CA

Mr. Ben Wells
Army Corp of Engineers
100 McAllister Street
San Francisco, CA

Mr. Bernard Klein
Department of Public Works
1727 - 1st Street
Napa, CA 94558

Other

Pacific Gas and Electric Company
24300 Clawiter Road
Hayward, CA

Audubon Society
c/o William Hurd
2754 Olive Avenue
Fremont, CA

Alameda County Farm Bureau
638 Enos Way
Livermore, CA 94550

Sierra Club
5608 College
Oakland, CA 94618

Other (Continued)

Livermore League of Women Voters
P. O. Box 702
Livermore, CA 94550

Berkeley League of Women Voters
1826 University Avenue
Berkeley, CA

Oakland League of Women Voters
Montgomery War Building
Oakland, CA

San Leandro League of Women Voters
1516 Regent Drive
San Leandro, CA 94577

Bay Area League of Women Voters
Claremont Hotel
Berkeley, CA 94705

League of Women Voters - Richmond Area
11275 San Pablo Avenue
El Cerrito, CA

Fremont League of Women Voters
P. O. Box 447
Fremont, CA 94536

Hayward League of Women Voters
4346 Edwards Lane
Castro Valley, CA 94546

Berkeley Recycling Collective
Sacramento and University
Berkeley, CA

Ananda Marga Center
Grove and Dwight Way
Berkeley, CA

Third World Recycling Center
2366 San Pablo
Berkeley, CA

Eden Area YMCA
24718 Mission Boulevard
Hayward, CA

San Leandro Ecology Center
1190 Davis Street
San Leandro, CA 94577

Other (Continued)

Kaiser Aluminum Can-Do Program
Ms. Gerri Rose
Kaiser Center, Room 2052, KB
300 Lakeside Drive
Oakland, CA 94643

Livermore Recycling Center
c/o Lois Hill
874 Adams Avenue
Livermore, CA 94550

Livermore Paper Project
Congregation of Mormon Church
2nd Ward
950 Mocho
Livermore, CA 94550

Valley Ecology Center
401 South "K" Street
Livermore, CA 94550

Mr. John P. Corley, Attorney
1056 Divison
Pleasanton, CA 94566

Mr. Dick Karn
Bissell and Karn
2551 Merced
San Leandro, CA 94577

Mr. John L. Johnson
905 East 14th Street
Oakland, CA

Mr. James W. Trimmingham
4419 - 2nd Street
Pleasanton, CA 94566

E. V. Hayden
Bay Area League of Industrial Associations
3640 Grand Avenue
Oakland, CA 94610

Mr. Douglas Albert
Dry Bulk Engineers
P. O. Box 1011
Grand Lake Stateion
Oakland, CA 94610

Ms. Mary Arnold
513 Ramona
Albany, CA 94706

Other (Continued)

Ms. Jean B. Byrens
6115 Chabot Road
Oakland, CA 94618

Mr. Tom Churchill
COMARK Design Group
Agriculture Building
Embarcadero at Mission Street
San Francisco, CA 94105

Ms. Diane Clardy
1641 Mountain Boulevard
Oakland, CA 94611

Mr. James Dahl
Kaiser Sand & Gravel
P. O. Box D
Pleasanton, CA 94566

Mr. Robert Feinbaum
2703 Fulton Street
Berkeley, CA 94705

Murray-McCormick, Inc.
Consulting Civil Engineers
7700 Edgewater Drive
Suite 654
Oakland, CA 94621

Mr. Jeff Hahn
2808 Regent
Berkeley, CA 94705

Mr. Ben Minton
16033 Via Catherine
San Lorenzo, CA

Ms. Peggy Moilien
Duncan and Jones
2161 Shattuck Avenue
Berkeley, CA 94704

Ms. Christine Quiles
750 Arguello Drive
San Leandro, CA 94578

Mr. Glen Rotner
Sierra Club
550 Elgsien Fields Drive
Oakland, CA 94605

Others (Continued)

Ms. Anne Rotramel
843 Washington
Albany, CA 94706

Dr. Arthur C. Smith
Cal State at Hayward
Department of Biological Sciences
Hayward, CA 94542

Ms. Anne Warborton
3925 Angelo Avenue
Oakland, CA 94619

Mr. Ben Yerger
Office of the President
Merritt College
12500 Campus Drive
Oakland, CA 94619

Newspapers

The Livermore Independent
2219 A First Street
Livermore, CA 94550

Valley Times
6908 Village Parkway
Dublin, CA 94566

Oakland Tribune
Tribune Tower
Oakland, CA

The Daily Review
116 W. Winton Avenue
Hayward, CA 94544

Tri-Valley Herald
Livermore Office
325 South "I"
Livermore, CA 94550

Pleasanton Times
P. O. Box 188
Pleasanton, CA 94566

The Montclarion
6208 La Salle Avenue
Oakland, CA

Newspapers (Continued)

Berkeley Daily Gazette
2049 Allston Way
Berkeley, CA

Alameda Times Star
1516 Oak Street
Alameda, CA 94501

Albany Times
1420 Solano Avenue
Albany, CA

Alameda County Observer
991 Williams Street
San Leandro, CA 94577

The Argus
37070 Fremont Boulevard
Fremont, CA

Portuguese Journal
3240 East 14th Street
Oakland, CA

The Piedmontek
P. O. Box 11095
Oakland, CA 94611

Libraries

Business and Government Library
Montgomery Street
Hayward, CA 94541

Alameda Public Library
9th and Santa Clara
Alameda, CA 94501

Berkeley Main Library
Shattuck Avenue and Kittridge
Berkeley, CA 94700

San Leandro Public Library
Community Library Center
300 Estudillo Avenue
San Leandro, CA 94577

Oakland Main Library
125 - 14th Street
Oakland, CA 94600

Libraries (Continued)

Union City Library
33942 Alvarado-Niles Road
Union City, CA 94587

San Lorenzo Library
395 Paseo Grande
San Lorenzo, CA 94580

Pleasanton Library
4333 Black Avenue
Pleasanton, CA 94566

Niles Library
150 "I" Street
Fremont, CA 94536

Newark Library
37101 Newark Boulevard
Newark, CA 94560

Irvington Park Library
41825 Blacow Road
Fremont, CA 94536

Fremont Library
39770 Paseo Padre Parkway
Fremont, CA 94536

Fairmont Library
15400 Foothill Boulevard
San Leandro, CA 94578

Dublin Library
6936 Village Parkway
Dublin, CA 94566

Castro Valley Library
20055 Redwood Road
Castro Valley, CA 94546

Livermore Library
1000 South Livermore Avenue
Livermore, CA 94550

Albany Branch Library
1260 Solano Avenue
Albany, CA 94706

Industry

Associated Homebuilders of the
Greater East Bay
Hotel Claremont
Berkeley, CA 94705

East Bay Chapter of California
Council of Engineers and Land Surveyors
c/o Robert Floyd
P. O. Box 287
Walnut Creek, CA 94596

Southern Alameda County Board of Realtors
2114 Mission Boulevard
Hayward, CA 94544

California Refuse Removal Council
Northern District
c/o Lawrence A. Zunino, President
Solano County
Vallejo Garbage Service
710 Marin Street
Vallejo, CA 94590

Oakland Scavenger Company
2610 Peralta Street
Oakland, CA 94607

Pleasanton Garbage Service
P. O. Box 399
Pleasanton, CA 94566

DePaoli Equipment Company
c/o Ralph Properties
4001 Vasco Road
Livermore, CA 94550

Turk Island Company
Neptune Drive
San Leandro, CA 94577

Mr. Myron Jones
c/o Pacific Gas and Electric Company
Gas Resources Division
245 Market Street
San Francisco, CA 94106

Bay Area League of Industrial Associations
Eveleth Hayden, Exec. Vice-Chairman
3640 Grand Avenue
Oakland, CA 94610

Association of Engineering Geologists
Richard Harding, President
California Division of Mines
San Francisco Chapter
P. O. Box 985
San Francisco, CA 94101

RESPONSES TO PRELIMINARY DRAFT
SOLID WASTE MANAGEMENT PLAN AND DRAFT
ENVIRONMENTAL IMPACT REPORT FOR ALAMEDA COUNTY
AUGUST, 1975

List of Responses to Plan and EIR

<u>Date</u>	<u>Agency/Individual</u>	<u>By</u>
August 27, 1975	Oakland Scavenger Company	Thomas Meichtry
September 5, 1975	East Bay Regional Park District	Richard C. Trudeau
September 12, 1975	State Lands Division	Walter Cook
September 23, 1975	State Department of Transportation	B. C. Bachtold
October 2, 1975	Political Action Conditions for the Environment	Louisa Jaskulski
October 2, 1975	City of San Leandro	W. R. Rugg
October 2, 1975	City of Berkeley	R. C. Gazlay
October 3, 1975	State Department of Water Resources	Wayne MacRostie
October 3, 1975	City of Newark	Charles Cashmark
October 3, 1975	San Francisco Regional Water Quality Control Board	Griffith L. Johnston
October 3, 1975	Oakland Scavenger Company	Peter Borghero
October 6, 1975	San Leandro League of Women Voters	Carol Federighi
October 6, 1975	Mulford Gardens Improvement Association	Audrey Albers
October 9, 1975	Association of Bay Area Governments	Yvonne San Jule
October 10, 1976	Political Action Coalition for the Environment	James Maresca
October 16, 1975	City of Pleasanton	Robert J. Harris
October 20, 1975	Oro Loma Sanitary District	Gail Stanton

October 22, 1975	State Department of Health	Earl W. Mortenson
October 24, 1975	Congress of Valley Agencies	Bette Meyer
October 24, 1975	Political Action Coalition for the Environment	Louisa Jaskulski
November 3, 1975	East Bay Chapter of the California Council of Civil Engineers and Land Surveyors	Richard A. Nystrom
November 12, 1975	East Bay Municipal Utility District	John S. Harnett
November 13, 1975	City of Oakland	James E. McCarty
November 14, 1975	City of Berkeley	John L. Taylor
November 18, 1975	State Office of Planning and Research	William G. Kirkham

ALAMEDA COUNTY STAFF RESPONSES TO
LETTERS RECEIVED ON PRELIMINARY DRAFT SOLID WASTE
MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

Summary
(Letters Summarized In This Section Follow)

1. Mr. Thomas Meichtry, Director, Solid Waste Management Division, Oakland Scavenger Company, August 27, 1975:

(The following is a brief excerpt from the Company's 17 page letter.)

The County Solid Waste Management Plan as drafted by the staff is in many instances inadequate, inconsistent and has failed to recognize or respond to many existing operational procedures and contracts. Staff recommendations as they have been presented in the Draft Plan are in some cases incapable of being implemented, are somewhat arbitrary and often times disregard the suggestions of Committee members.

The background reports provided to the Committee were for the most part good representations of existing conditions in the County. However, several of the findings and conclusions presented in the Draft Plan are not substantiated in the background reports and in some instances are entirely inaccurate and misleading.

It is our intent in this letter to identify as many of the statements we found inconsistent or in error and to offer substitute language to be acted on by this Committee and be incorporated into the Draft Plan prior to general circulation of the document.

Staff Comment: The Oakland Scavenger Company has been represented by Mr. Meichtry on both the Solid Waste Management Plan Advisory and Technical Advisory Committees. The findings and conclusions presented in the Draft Plan were developed from background reports prepared with the assistance of the Technical Advisory Committee and represent as accurate an assessment of existing solid waste activities as could be prepared in a two-year study. Any inconsistencies between language in Sections I and VIII have been resolved in this revision. Recommendations concerning plan implementation and administration have been subjected to wide and thorough public discussion as documented in other sections of this EIR and Plan.

2. Mr. B. C. Bachtold, Deputy District Director, State Department of Transportation, September 23, 1975:

The Plan and the Report are adequate insofar as functions and responsibilities of the Department of Transportation are concerned.

3. Mr. Richard C. Trudeau, General Manager, East Bay Regional Park District, September 25, 1975:

No comment on plan, but interested in the potential for recreational use of reclaimed sanitary landfill sites.

4. Mr. Walter Cook, Staff Attorney, State Lands Division, September 12, 1975:
No comment on substance of draft plan.

5. Mr. David Hill, State Department of Water Resources, September 25, 1975:
Comments made on geologic and groundwater aspects in Sections II and III of the draft plan.

Staff Comment: Technical changes have been made as suggested.

6. Ms. Louisa Jaskulski, Political Action Coalition for the Environment (PACE) Solid Waste Management Planning Committee, October 2, 1975:

PACE recommends that "comprehensive planning and regulations is best done by a single, politically accountable agency."

7. Mr. William Rugg, Director, Community Development Office, City of San Leandro, October 2, 1975:

Comments relate to two general issues--plan administration and policy statements. The City also requested further clarification of several specific issues including the role of the public sector, financing, source reduction, and stimulation of secondary materials markets.

Staff Comment: Staff provided a point-by-point response to the City of San Leandro which will be summarized here.

With respect to Plan Administration and Implementation, it would be preferable to apply the concept of joint participation in these responsibilities by all jurisdictions as the Plan clearly states (p. 1-8): that cities retain authority for collection and maintenance of their franchise. The city must also continue fulfilling its responsibilities in making land use decisions with regard to the location of new facilities. However, all new facilities should be designed and located based upon the flow of solid waste which may not exactly coincide with city boundaries. Responsibility for general location of facilities would be the responsibility of the Solid Waste Management Board. If either private capital or public capital were invested, the optimizing decisions would be made based upon waste generation and overall efficiencies. The role of the cities clearly is that of full participation in the countywide effort through the joint exercise of power agreement.

The problems associated with developing a facilities plan before establishing an inter-governmental structures for participation and policies are obvious. Local issues must also be resolved by the respective city. There is a strong feeling throughout the County to promote the private scavenger industry and allow them the widest latitude possible to develop the system. However, there is a requirement that facilities be in conformance with the Plan and this would include such tests as cost effectiveness, efficiency, resource recovery, geographic area served.

8. Mr. R. C. Gazlay, Assistant Director of Public Works, City of Berkeley, October 2, 1975:

The City recommends a few revisions to the plan and requests clarification of proposals for plan implementation and allocation of system costs among the agencies within the County.

Staff Comment: The City of Berkeley was provided a detailed response by staff to specific questions. In summary, staff agrees that all aspects of collection should be handled at the local level by each city, but collection is only one aspect of a solid waste management system. The countywide plan focuses on solid waste as a countywide/regional problem. Final decisions about financing should be made by the Joint Powers Board after it is formed. Costs and credits should be allocated based upon system costs and user charges so that users of the service benefit as much as is practical. Also, it is important to have all local governments demanding and purchasing high quality goods containing secondary materials under their own policies.

9. Mr. Wayne MacRostie, Chief, State Department of Water Resources, October 3, 1975:

Comments on geologic and groundwater aspects of the plan are identical to those submitted by David Hill on September 25, 1975, and suggested technical revisions have been incorporated into the plan.

10. City of Newark, October 3, 1975:

The City's concerns and comments focus on (1) a concern that increased public employment may result, (2) clarification of proposed policies, (3) reduction in the amount of or change in collection procedures for solid wastes, (4) ramifications of proposed plan, (5) adequacy of economic considerations, and (6) benefits to the South County area.

Staff Comment: Staff has responded in detail to the City of Newark's concerns. To summarize, there is nothing in the Plan that would suggest any reduction in the present level of activity by the private scavenger companies in Alameda County. Any decision to finance and/or operate a materials and/or energy recovery facility either publicly or privately should be made in the future after an adequate and acceptable countywide inter-governmental structure for solid waste management has been formed. Sanitary landfill is not envisioned as a long-term solution for the South County's refuse because landfill on the Bay shorelines would be in conflict with the Plan's and the State's policies towards resource recovery and with local and areawide plans regarding appropriate uses for bay lands. The proposed Joint Powers Board will focus its planning and implementation on countywide concerns--processing, materials and energy recovery, and residuals and special wastes disposal; policy; public information; and financing.

11. Mr. Griffith L. Johnston, Chief of Planning, Regional Water Quality Control Board, San Fransisco Bay Region, October 3, 1975:

Mr. Johnston urges that the development of mitigative measures to control bay water intrusion, percolation of leachate into groundwaters and runoff (from landfill sites) and that their implementation be given high priority in the early stages of detailed planning. Also recommends a policy statement to this effect be included in the current report. Policies for both landfill site selection and regulation of toxic waste disposal are most important, he believes.

Staff Comment: Staff concurs with Mr. Johnston's statements. This is a policy objective stated in the Plan and one for which operational standards are recommended.

12. Mr. Peter Borghero, President, Oakland Scavenger Company, October 3, 1975:

The Company outlines its concerns with respect to the Preliminary Recommendation of the SWMPAC. Specifically, the Company objects to the concept of "no major long-term commitment, either to public or private enterprise, be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production, and disposal." The Company also objects to the creation of a new joint powers agency.

Staff Comment: Staff provided a response to this letter for the Alameda County Planning Commission which attempts to clarify some of the misconceptions in this letter. A majority of the SWMPAC members wished to avoid a long-term commitment which would foreclose future options for materials or energy recovery. Once committed to a long-term landfill, the decision to change practices comes with difficulty. In this manner, the questions regarding private ownership/operation could be adequately evaluated. The Plan does not recommend a new layer of government. It does recommend a new agency (Joint Powers Board) to coordinate solid waste planning at the countywide level, but the agency would rely on existing agencies with minimal additional staff required to continue their present functions.

13. Mrs. Carol Federighi, President, San Leandro League of Women Voters, October 6, 1975:

Their statement includes support of several recommendations in the draft: (1) to work toward regional planning of solid waste management, (2) to explore presently developing alternatives, (3) to avoid a major long-term commitment, either to public or private enterprise, be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, and energy production, and disposal. The League recommends that the plan give more emphasis to source reduction. Also, it supports further study of the Bay Delta project. The League desires that the County Planning Commission and Board of Supervisors consider that the Davis Street site is designated as Open Space on local plans.

Staff Comment: Staff recognizes that source reduction is important and should be emphasized during plan implementation. The Bay Delta project will be explored further by the agency assigned the authority and responsibility for plan implementation.

14. Mrs. Audrey Albers, Mulford Gardens Improvement Association (MGIA), October 6, 1975:

The MGIA is concerned about the future use of the Davis Street disposal site and believes that the underlying understanding throughout the Plan is that the Davis Street site will be the location of Oakland Scavenger's transfer station. This use would be in conflict with San Leandro's General Plan and the County Open Space Element. The issue of source reduction and greater material recovery should be pursued more aggressively and positively, and much of the reduction could and should be handled at the local level. The statement also supports source separation, more consideration of the Bay Delta alternative, and a more equitable rate structure.

Staff Comment: All facilities proposals are to be in conformance with the Plan. The Plan does not endorse any specific site location for new facilities. The references to the Davis Street site primarily pertain to its present use as a land disposal site, and its existing zoning will be pointed out in the revision of Section II of the Plan.

15. Mrs. Yvonne San Jule, Regional Planner, Association of Bay Area Governments (ABAG), October 9, 1975:

ABAG Staff review of preliminary Alameda County Solid Waste Management Plan for issues of regional significance completed. Outline of comments on Plan approved by the Regional Plan Committee on October 1. Plan presents a strong framework of policies for guiding future decisions on source recovery programs and systems and on necessary institutional arrangements for Plan implementation. Details of composition of Policy Board of Joint Powers Agency to be decided by signatories to agreement. Letter contains specific comments on Regional Coordination.

16. James Maresca, Solid Waste Management Planning Committee, Political Action Coalition for the Environment, October 10, 1975:

Concerns of PACE relate to the Oakland Scavenger Company's letter of October 3, 1975, criticizing the SWMPAC's recommendations. "In summary, the OSC recommended modifications, if accepted, would totally invalidate countywide planning efforts and would place primary control of solid waste planning firmly in the virtually unregulated hands of the Oakland Scavenger Company."

17. Mr. Robert Harris, Planning Director, City of Pleasanton, October 16, 1975:

The City is concerned about the synthesis of the various environmental factors into a generalized "environmental constraints" map (specifically the Q designation for quarry). The Plan lacks consideration toward the degree of risk should environmental degradation unexpectedly occur. Pleasanton is opposed to any landfill operations in the quarry areas of the Livermore-Amador Valley. City also recommends that policy be directed towards protecting land uses from the encroachment of sanitary landfill operations. Recommendations also pertain to plan administration, financing, and management operations.

Staff Comment: The City Council incorporated these concerns as conditions of approval in their Resolution No. 75-230. The plan has been amended to clarify the use of the environmental constraints map in Section IV. The Resolution states that the Draft EIR is inadequate in that it does not sufficiently explore the environmental character of those areas designated as quarry. The EIR does not explore the environmental character of any specific locations in the County because it makes no facilities proposals. It is extremely unlikely that the quarries in the Livermore-Amador Valley would be used as landfill sites because of overriding environmental and social impacts; but if such a proposal is made, the project EIR is the appropriate place for a thorough environmental analysis.

18. Gail Stanton, General Manager, Oro Loma Sanitary District, October 20, 1975:

Comments refer to revisions on pages 11-73, 74 and V-3. Table 11-23 is misleading; and says 17.8% in paragraph 2 (p. 11-74) is wrong; it would be 9% or so. Capacity of pack truck is not 50 gallons.

Staff Comment: Figures in the Plan are the most accurate available. On page V-3, heading should read "Container Capacity," which is correctly shown as 50 gallons in the Plan.

19. Mr. Earl W. Mortonson, Region 1 Supervisor, State Department of Health, October 22, 1975:

Comments focus primarily on the public health aspects of the various phases of solid waste handling with emphasis on vector and hazardous waste concerns. An inventory needs to be made during the early stage of plan implementation of animal manure, hospital/infectious waste, chemical toilet waste, and septic tank pumpage. The Plan needs to consider other alternatives for food processing waste than export. Local regulations governing storage should be reviewed. The Plan should contain a statement of health hazards of the present collection system and identify those areas where increased refuse removal is needed. The buffer zone concept would need to be considered as one factor in the final selection of a disposal or recovery system. In the development of a new solid waste management ordinance, the Health Department's Environmental Health Division needs to be clearly identified as having the key responsibility for surveillance, enforcement, setting standards, and program evaluation. The proposed enforcement responsibility (to act as a hearing board) of the proposed Solid Waste Enforcement Commission may conflict with the County Health Officer's powers to conduct hearings on environmental health matters.

Staff Comment: Staff agrees with the State's recommendations. Their considerations will be implemented during the early stages of plan implementation.

20. Ms. Bette Meyer, Executive Director, Congress of Valley Agencies (COVA), October 24, 1975:

The Steering Committee objects to the formation of a new governmental-agency for solid waste and supports the organization of an advisory commission for plan coordination. Other concerns refer to source reduction, monitoring of sites/facilities, community land use concerns, practicality of 67% recovery by 1980, and future energy production.

21. Louisa Jaskulski, PACE Solid Waste Management Planning Committee, October 24, 1975:

PACE states its position on three aspects of the plan. It supports the "no major long-term commitment" principle. A single, countywide agency governed by an independent board is needed for plan administration and enforcement. PACE supports source reductions, recycling, and collection innovations.

22. Mr. Richard A. Nystrom, President, East Bay Chapter of the California Council of Civil Engineers and Land Surveyors, November 3, 1975:

Opposed to the creation of a countywide solid waste management authority to administer the proposed plan.

23. John S. Harnett, General Manager, East Bay Municipal Utility District, November 12, 1975:

EBMUD in general concurs in the plan and has no objection to its contents nor to the Advisory Committee's recommended amendments. Whether EBMUD subsequently might become involved as an owner/operator of the resource/energy recovery facility proposed in the Plan for future implementation will depend on five factors outlined in the letter.

24. Mr. James E. McCarty, City Manager, City of Oakland, November 13, 1975:

Mr. McCarty suggests that the City Council response to the Draft Plan include several recommendations. Briefly, these include: (1) any organization of a Solid Waste Management Board through the joint exercise of powers procedure must reasonably balance the relative factors of population, assessed valuation, and refuse generation as well as natural geographic or political boundaries; (2) recognition of the need to resolve the short-range (and intermediate long-range) disposal requirements without delay (or protracted study); (3) retention by local agencies of determination of level of service, rate-setting, and franchise fees; (4) joint exercise of powers authority should resolve critical issues of its powers, size and level of staff, and resource recovery abilities; (5) retention of the County Health Services Agency as the enforcement arm; and (6) efforts of the JRRC should continue and be included in the plan.

Staff Comment: This letter precedes the action of the Oakland City Council on November 18, 1975. The City Council resolution is recognized in the revised report.

25. John L. Taylor, City Manager, City of Berkeley, November 11, 1975:

Mr. Taylor's communication forwarded the City of Berkeley's Solid Waste Management Commission's evaluation and criticism of the Plan. The Commission has three major areas of concern: The Joint Powers Board, plan management and administration, and alternative resource recovery systems. More examination of alternatives to the Joint Powers Board is needed. Serious consideration must be given to other organizational means of plan administration and implementation, most obviously the creation of a new, single Solid Waste Management Administration Agency. A better discussion of composting and of the Bay Delta Project should be included in the plan. More information and discussion of source separation is also needed. Two policy issues--transfer stations and volume of resources recovered--are discussed. The issue with transfer stations is the number and location of stations that will be needed and the accuracy of cost data for various modes of transport. Firmer statistics are needed to substantiate the economic reasonability of the Plan.

Staff Comment: The Commission's comments raise important questions which will need time and study to resolve. It is recommended that the Berkeley Solid Waste Management Commission work with the countywide solid waste management agency during plan implementation to resolve the deficiencies and points of misunderstanding. Many of the specific comments in Appendix B (of the Commission's communication) have been incorporated into the revised plan.

26. William G. Kirkham, Management Systems Officer, State Clearinghouse, Office of Planning and Research, November 18, 1975:

The letter contains attached comments from the State Water Resources Control Board, the Air Resources Board, the State Solid Waste Management Board, and the Department of Parks and Recreation.

Staff Comment: Many of the State's comments are informative and have been incorporated into the Plan and EIR. Others will be useful during Plan implementation. With reference to the State Water Resources Control Board's comment that "the plan and the associated EIR do not present adequate solutions to the existing solid waste management problems of the County," it should be pointed out that the plan is a direct result of the State Guidelines prepared by the State Solid Waste Management Board. Compliance with these requirements necessitated thorough study of a wide variety of problems and aspects of solid waste management. This is the first step in developing adequate solutions. The plan policies and alternatives provide the necessary framework for comprehensive solid waste planning and implementation for the next 25 years. Implementation of the policies will solve existing solid waste problems in Alameda County.

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

August 27, 1975

Mr. Hiram Wolch, Ph. D.
Chairman
Alameda County Solid Waste
Management Plan Advisory Committee

Dear Mr. Wolch:

The County Solid Waste Management Plan as drafted by the staff is in many instances inadequate, inconsistent and has failed to recognize or respond to many existing operational procedures and contracts. Staff recommendations as they have been presented in the Draft Plan are in some cases incapable of being implemented, are somewhat arbitrary and often times disregard the suggestions of Committee members.

The background reports provided to the Committee were for the most part good representations of existing conditions in the County. However, several of the findings and conclusions presented in the Draft Plan are not substantiated in the background reports and in some instances are entirely inaccurate and misleading.

It is our intent in this letter to identify as many of the statements we found inconsistent or in error and to offer substitute language to be acted on by this Committee and be incorporated into the Draft Plan prior to general circulation of the document.

Due to the voluminous nature of the document and the brief review period allotted we recognize that we were unable to fully comment on each item, however we believe we have commented on the most relevant issues presented.

Briefly it is our finding and recommendation that the County Solid Waste Management Plan be implemented in accordance with the following general principles:

1. The Board of Supervisors should appoint a Solid Waste Management Coordinator within the existing Alameda County Health Care Services Agency or Public Works Agency.
2. The Board of Supervisors should appoint a Countywide Technical Committee.

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

3. Expand the Joint Refuse Rate Committee concept for application on a countywide basis.
4. Assign tasks to the Coordinator and these committees to coordinate the activities of the public agencies and private industry involved in solid waste management.

Some of the reasoning leading us to these conclusions were based upon analysis of the alternative as recommended by the Staff, namely creating a new joint exercise of power agreement providing equal representation for cities and special districts (p. 1-7). At first glance this appears to be a very good recommendation but upon further examination, this board would by definition consist of 19 members with representation from the county, 13 cities and 5 special districts. Such a board would be obviously impractical, unworkable and probably incapable of implementation. It is also uncertain whether each of the individual agencies would be willing to assign some of their basic responsibilities to a joint agency, and the unwillingness of any one agency to do so would prevent the formation of the joint agency or effectively jeopardize its efficient operation.

Further, at the last meeting of the committee, Mr. Jennings Smith, Finance Director of the City of Oakland gave this committee a detailed report on the progress being made by the Joint Refuse Rate Committee. This joint committee has been meeting since 1972 and has drafted a model contract for use in contracting with Oakland Scavenger Co. One of the primary features of this model contract is the term which is being recommended as 25 years for all agencies located within the Central and Eden Planning Units. This was recognized as the most practicable in order to allow Oakland Scavenger Co. sufficient time to amortize the large capital expenditures necessary for construction of the solid waste disposal facilities and to provide reasonable rates to the users of the service.

If this model contract is implemented many of the features of the draft Solid Waste Management Plan become superfluous. For example, Element 4-Finance as proposed by the staff is being carried out by the present Joint Refuse Rate Committee for the major portion of the county and it would seem more reasonable to expand that approach than to create a whole new agency.

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

The details of our recommendations are set forth in the enclosed proposed revisions to the draft Solid Waste Management Plan. We urge your serious consideration of these revisions because we believe that they will produce a plan that is capable of implementation and approval by a majority of the cities in Alameda County.

Respectfully Submitted,

Peter Borghero
President

By



Thomas Meichtry
Director-Solid Waste
Management Division

PB/TM/kd
Enclosure

PROPOSED REVISIONS
SOLID WASTE MANAGEMENT PLAN

SECTION I

Page I-1, Para. 2, line 5

DELETE: In addition, the county has one of the nation's largest scavenger companies (Oakland Scavenger Company) which serves virtually the entire county through exclusive franchises.

ADD: In addition, most communities in the county utilize the services of one of the nation's largest solid waste management companies (Oakland Scavenger Company) which serves about 80% of the county population through exclusive franchises.

Page I-3, Para. 1, line 1

DELETE: it accounts for over fifty percent

ADD: it accounts for about sixty-five percent

Page I-3, Para. 1, line 3

DELETE: presently

ADD: in 1973

Page I-3, Para. 2, line 8

ADD: generates approximately the same income

Page I-3, Para. 5, line 9

ADD: As a result, in 1972 a Joint Refuse Rate Committee was established under a Joint Powers Agreement among ten jurisdictions and by working with industry will complete this year a new Master Agreement and updated rate review process.

Page I-7, Para. 7, line 3

DELETE: Audit paths suggested in the Price Waterhouse study of 1972 should be implemented immediately

ADD: The final agreed format of the Joint Refuse Rate Committee should be implemented as soon as practical.

Page I-7, Para. 8, line 7

DELETE: where legal requirements or public sentiment dictate....
should be carefully evaluated.

ADD: Every opportunity should be made available to private investment in high risk capital expenditures such as resource recovery or energy recovery so as to protect public funds where there is a questionable return on investments.

Page I-8, Para. 8, line 2, 3, 4, 5 and 6

DELETE: Audit procedures....of the earliest date.

ADD: Audit procedures as well as a model contract as presented in a final agreement format between the Joint Refuse Rate Committee and Oakland Scavenger Company should be implemented as soon as practical.

SECTION II

Page II-47, Para. 6, line 6, 7, 8, 9

DELETE: The shredder does not operate daily ... and operational effectiveness.

Page II-51, Para. 6, line 2

DELETE: talked about

ADD: proposed

Page II-61, Para. 2, (entire paragraph)

DELETE: The Oakland Scavenger Company's method ... with crew size.

ADD: Oakland Scavenger Company designs its routes on the basis of revenue produced within a geographical area rather than on the tonnage produced or work load method. Crew size depends on the terrain of the route, as well as, whether the route is mostly residential, apartments, commercial or industrial. The hill routes are two-man crews and generally produce 25 to 35 percent less revenue and tonnage than more level areas. The majority of the companies routes are on level terrain and consist of 3-man crews. There are very few four-men crews and occur where there is extra heavy work load and difficulty in removing containers, mostly in the downtown areas.

Work assignments are made on a seniority basis according to Union prescribed bidding procedures. The hill routes are the lowest seniority positions and other routes such as front end loader and drop box require many years of seniority for qualification. As a result of the seniority system younger men generally occupy the more physically demanding positions, but older men can stay on a particular route if they do not wish to bid for other openings.

Page II-68, Para. 3, line 2

DELETE: Because it is located adjacent to San Francisco Bay and because it has exhibited evidence of seepage and discoloration in the adjacent surface water, the potential for further contamination is great.

ADD: It is located adjacent to San Francisco Bay. In 1942 an impervious dike was constructed around the perimeter of the site in a semi-circular arc. No evidence of seepage through this dike has ever been detected. There was some evidence of seepage along the easterly boundry of the site which is not adjacent to any water body, and this seepage was stopped in 1972 by construction of a continuous cut-off barrier using imported clay soil. There is virtually no potential for contamination because of the impervious nature of the barriers.

Page II-68, Para. 3, line 7

DELETE: and the area next to the dike is subject to inundation by waves and tidal action.

ADD: but the area next to the dikes is well protected with a sufficiently high rip-rapped dike and is not subject to inundation by waves or tidal action.

Page II-68, Para. 3, line 13

DELETE: to control the rat population.

Page II-69, Para. 2, line 4, 5, 6, 7, 8

DELETE: While the levees are behind and domestic purposes,

ADD: The levees are believed to be relatively impermeable and leachate problems have not yet been reported. The disposal site overlies groundwater in the salt water contaminated Newark Aquifer,

Page II-70, Para. 1, line 2

ADD: Alameda, Davis Street

Page II-70, Para. 1, line 4

DELETE: is being constructed on the site

ADD: has been proposed for the area, and Albany landfill is also closed.

Page II-71, Para. 2, line 2

DELETE: is not performed consistently.

ADD: is performed on a regular basis.

Page II-71, Para. 2, line 3

ADD: such as police department or "postal department"

Page II-71, Para. 5, line 2,3

DELETE: and most of the sites are responsible for creating
adverse environmental impacts.

ADD: but are being operated as Modified Sanitary Landfills.
Some of the sites potentially could create adverse
environmental impacts.

Page II-72, Para. 1, line 5, 6, 7, 8

DELETE: However, if large-scale energy recovery facilities.

ADD: Large-scale resource recovery programs when implemented
would aid in reducing the amount of waste going to land-
fills, but existing close-in sites will be exhausted before
implementation of these systems is possible. This will
require that transfer and long haul systems be initiated
to more remote land disposal areas. Large quantities of
material could be diverted from landfills into material
and/or energy recovery facilities in the future.

Page II-74, Para. 6, line 4

ADD: A portion of the remaining 90 percent

Page II-75, Para. 1, line 1

DELETE: proposed

ADD: feasibility study

SECTION V

Page V-2, Para. 5, line 5

DELETE: transfer container

ADD: packing barrel

Page V-3, Para 1, line 3

DELETE: transfer container

ADD: packing barrel

Page V-5, Para 2, line 9,10

DELETE: No solid wastes should remain at the transfer station at the end of the working day.

ADD: Waste is usually removed from the transfer station within a few hours on a daily basis, Monday through Friday, and the storage-breakdown pit should be cleaned out once per week.

Page V-5, Para, line 3

ADD: In Alameda County three transfer stations have been proposed with a tentative fourth. One is proposed for the Pleasanton Area, one in the City of San Leandro, one in the Hayward Area, and possibly one in the Northwest Oakland or Berkeley Area.

Page V-32, Para 3, line 3

DELETE: proposed

ADD: studied

SECTION VIII -

Page VIII-1, Findings 10 and 12

DELETE: 10. In general, regulation of land disposal operations by regional, county, and city agencies is not performed consistently.

12. Regulatory responsibility is highly fragmented; no single agency is maintaining supervision over activities at the sites in Alameda County. Instead, each public agency concentrates on only one aspect of disposal operations. There is almost no comprehensive monitoring of landfill sites in the county being carried on by one agency or in coordination with concerned agencies.

ADD: 10. Regulation of land disposal operations is performed on a regular basis by regional, county and city agencies and no single agency provides overall supervision or coordination. Each public agency concentrates on those aspects of disposal operations under its jurisdiction and some cooperation between agencies presently exists.

Page VIII-2, Finding 11

DELETE: 11. While present laws call for safe and efficient land disposal of solid wastes, existing enforcement procedures are not adequate to accomplish the intent of these regulations.

ADD: 11. The state has adopted minimum standards for solid waste handling and disposal. Legislation has been introduced to provide enforcement power to the state. Existing regulations in Alameda County are somewhat outdated when compared to the minimum state standards.

DELETE: 13. None of the sites presently in operation in the county may be considered sanitary landfills, with one possible exception--the Eastern Alameda County Disposal Site.

ADD: 13. The land disposal sites presently in operation in Alameda County meet the current local ordinances and regulations. These ordinances do not require daily earth cover of the advancing working fill face and therefore must be classified as modified sanitary landfills.

DELETE: 14. Problems relating to environmental quality are associated with several of the sites which are close to San Francisco Bay.

- ADD: 14. Proximity of several of the landfill sites to San Francisco Bay creates potential for problems related to environmental quality.
- DELETE: 15. Operational problems were apparent at most disposal sites in Alameda County in the Fall of 1974.
- DELETE: 16. In general, control over the types of materials being dumped is lacking. Few site operators thoroughly inspect incoming materials, and hazardous materials or non-permitted wastes could be covertly deposited at most of the sites.
- ADD: 16. General control over the types of materials being dumped is good. Customers known to have hazardous or questionable materials are turned away or referred to the Regional Quality Water Control Board for approval to dispose of the waste. A thorough inspection of the contents of each mixed load entering the site is impracticable. Individual loads of sludges or liquids require a chemical analysis to accompany each load. Small quantities of nonpermitted waste could be concealed in a mixed load and deposited at a landfill site.

Page VIII-2, Policies - Resource Considerations

- DELETE: 2. The "out of sight, out of mind" philosophy of waste disposal is invalid in a world of finite resources.

Page VIII-3, Policies Operational and Management Considerations

- DELETE: 1. Standards based upon the statewide standards should be revised and adopted for local applications.
- ADD: 1. New statewide standards should be applied for local application for consistency throughout the state.
- DELETE: 2. A single county agency should be assigned overall authority and responsibility for a monitoring program to prevent all forms of environmental pollution. Federal, state and local standards and regulations must be vigorously enforced.
- ADD: 2. A single county agency should be assigned overall authority and responsibility for program coordination to prevent all forms of environmental pollution. Federal, state and local standards and regulations must be enforced.

DELETE: 3. The proliferation of land disposal sites should be discouraged.

ADD: 3. A minimum of land disposal sites should be....

Page VIII-3, Policies - Cost/Financing Considerations

DELETE: 2. While lack of operational standards might result in lower development and operating expenses, the resulting environmental pollution would be borne by society as social costs.

Page VIII-9, Findings - Present Legal Constraints

DELETE: 6. While many administrative and operational activities must be carried on by city government (collection franchise negotiations, quality of service, etc.), there would be certain advantages to a county-wide approach and coordination of activities.

Such activities could include: (a) determining service areas, (b) arbitration of negotiations, (c) development of information systems, (d) evaluation of rate increase requests, and (e) coordination of transfer and processing activities, etc., and many others.

ADD: 6. Ten of the 13 districts or cities being served by Oakland Scavenger Co. have formed the Joint Refuse Rate Review Agency. This Joint Agency has employed Price Waterhouse to review the final procedures of Oakland Scavenger Co. and is presently preparing a model contract for use by all agencies contracting for service with OSC. The proposed contract has a term of 15 to 25 years to permit maximum capital recovery time to OSC and minimum rates to users of the service.

Page VIII-9, Policies - Present Legal Constraints

DELETE: The application of a county-wide waste management plan will necessitate a modern waste ordinance as well as standards and regulations. The county waste management agency would begin this work immediately; it should also be the repository for all financial and technical data from industry and local government.

ADD: Existing operations can continue within the framework of the present agencies and organizations. To implement a county-wide solid waste management plan, a county-wide coordinator and Technical Committee should be appointed and the Joint Refuse Rate Committee should be expanded to county-wide status. They should review the existing ordinances and standards and recommend modifications to be consistent with minimum state standards.

2. State (and Regional) Level

ADD: Profits and losses from resource recovery operations

SECTION VIII-

DELETE: Implementation Program - pages VIII-26 to VIII-30

ADD: a new section on Plan Administration in accordance with the following statement from the State Solid Waste Management Board Guidelines for the Preparation of County Solid Waste Management Plans:

6. **PLAN ADMINISTRATION**—The plan shall provide for an organizational structure to administer the Plan. No one governmental organizational pattern for executing local solid waste management programs can be said to be best. Local conditions and customs will determine whether a separate solid waste department is needed or whether an existing agency or coalition of agencies can be assigned responsibility for administration of the solid waste management program delineated by the Plan.

Regardless of the administrative arrangements, the following functions must be assigned and performed: policymaking, public information, budgeting, planning, adoption and enforcement of ordinances and standards, and management and operation of the system. Operation of the system may be by private industry with local government maintaining responsibility for assuring the quality and level of service.

and the following State Solid Waste Management Board Plan Review Checklist:

13) Plan Administration

- (a) Organizational structure to administer the plan.
(17177a)
- (b) Assignment of functions including: policymaking, public information, budgeting, planning, adoption and enforcement of ordinances and standards, and management and operation of the system. (17177b)
- (c) Relationship of local jurisdictions (cities, districts) and private industry to county plan; identify roles and responsibilities of each. (17177b)

Plan Administration

(a) Organization structure to administer the plan

- Task 1 - The Board of Supervisors should appoint a Solid Waste Management Coordinator within the existing Alameda County Health Care Services Agency or Public Works Agency.
- Task 2 - Board of Supervisors should appoint a Countywide Technical Committee to review existing county ordinances and regulations pertaining to solid waste management.
- Task 3 - Board of Supervisors should expand Joint Refuse Rate Committee concept for application on a countywide basis.

(b) Assignment of functions including: policymaking, public information, budgeting, planning, adoption and enforcement of ordinances and standards, and management and operation of the system.

Policymaking

Policy shall be established by governing boards of the affected local agencies following recommendations by the County Solid Waste Management Coordinator, Countywide Technical Committee, the Expanded Joint Refuse Rate Committee and the public at large.

- Task - Adopt new countywide standards and regulations for solid waste management; based on review of current ordinances and State Minimum Standards.
- Task - Evaluation of current waste management activities for efficiency, cost and environmental effectiveness.
- Task - Review of concept of countywide Litter Control and Bottle Bill.
- Task - Establish a program of legislative review; identify problems which must be addressed and resolved by changes in State and Federal policies.
- Task - Determine legislation needed and recommend same to State.
- Task - Continue liaison with State-County regional waste management plan committee through ABAG.
- Task - Evaluate the common problem areas and coordinate with Santa Clara and Contra Costa Counties and other neighboring counties.

For example:

- landfill capacity(s)
- hazardous wastes
- import and export questions
- resource recovery potential

Task - Participate in regional study of Class 1 Disposal sites and needs in coordination with ABAG, State Health and Solid Waste Board and other state agencies, industry producers, haulers and disposal site operators.

Task - Develop and submit for review program planning charts for resource recovery and energy recovery facilities. Based upon present estimates of capital requirements develop fund acquisition program.

Alternative¹1: State General Obligation Bonds

Alternative 2: State Revenue Bonds

Alternative 3: Local General Obligation Bonds

Alternative 4: Local Revenue Bonds

Alternative 5: Private Financing

¹not in order of priority

Public Information

A cooperative Public Information program should be carried out by Solid Waste Management Coordinator, local ecology centers, and industry,

Task - Provide information to public on countywide waste management Plan (Plan Summary).

Task - Develop information packet on recycling centers and other relevant projects.

Task - Evaluate the school education project for application in other communities.

Task - Provide a speakers' bureau available to the community.

Budgeting

Prepare and submit for approval to Board of Supervisors an annual budget to finance the Plan Administration.

Planning

Periodic review and update of County plan and review of ongoing research programs to determine applicability for Alameda County.

Task - Monitor resource and energy recovery demonstrations and integrate new technology into the Plan.

Task - Determine funding requirements for resource and energy recovery projects for Alameda County.

Task - Evaluate resource recovery potential within each jurisdiction for feasibility of planned resource recovery. Evaluation factors to be considered:

- volumes (current and projected)
- quantities and characteristics
- source separation
- separate collections
- materials, standards and markets

Task - Review and update plan every three years.

Adoption and enforcement of ordinances

Adoption of ordinances and standards should be by the policymaking bodies. Enforcement should be carried out through existing enforcement agencies and coordinated by Solid Waste Management Coordinator.

Task - Coordination of current regulatory functions of various agencies including Federal, State, Regional, County, City and local.

Task - Solid Waste Management Coordinator to assure consistent enforcement of adopted regulations and standards.

Management and operation of the system

Management of the system will be performed by a combination of public and private ownership and operation. Major areas of activity to include collection, transport, processing/resource recovery, disposal and financing.

Task - Review impact on system of proposed legislation such as packaging controls, bottle bills and source separation programs.

Task - Financing of resource recovery operations must be evaluated.

Task - Evaluate the revenues generated through user charges and the rates charged in each jurisdiction.

Task - Establish and adopt audit procedures.

Task - Determine suitability and adopt model agreement for refuse collection.

Task - Evaluate alternatives of ownership/operation of waste disposal and transfer facilities.

Task - Evaluate state-of-the-art technology for materials and energy recovery systems which may account for 67% to 87% reduction in waste going to landfills.

- (c) Relationship of local jurisdictions and private industry to county plan; identify roles and responsibility of each.

Local jurisdictions (cities and districts) should retain their primary responsibility for waste collection activities either through public or private operations.

Private industry should continue to provide low cost, effective management (collection, transport, recovery, disposal, financing) of day-to-day operations and provide long term capability for proper disposal as well as development of more desirable methods of handling solid wastes including material and energy recovery processes.

The county should administer the county plan and coordinate activities of public and private agencies.



EAST BAY REGIONAL PARK DISTRICT

11500 SKYLINE BOULEVARD/OAKLAND, CALIFORNIA 94619/TELEPHONE (415) 531-9300

BOARD OF DIRECTORS:

HOWARD L. COGSWELL, President;

JOHN J. LEAVITT, Vice President;

PAUL J. BADGER, Secretary

MARY LEE JEFFERDS, Treasurer; FRED C. BLUMBERG, WILLIAM F. JARDIN, CLYDE R. WOOLRIDGE □ RICHARD C. TRUDEAU, General Manager

September 5, 1975

RECEIVED
SEP 8 1975

Mr. William H. Fraley
Director of Planning, County of Alameda
899 Elmhurst Street
Hayward, CA 94544

ALAMEDA COUNTY
PLANNING DEPARTMENT

Subject: Alameda County Solid Waste Management Plan Draft

Dear Mr. Fraley:

Thank you for sending us this draft plan for review.

We have no comment on the plan, but we are interested in the potential for recreational use of reclaimed sanitary landfill sites. This concept would be appropriately applied to urban communities where the "natural" landscape is no longer available. It would also provide land for intensive recreational use which is not available in the rugged terrain of our truly "natural" parks.

We would be happy to explore this with you as your plans develop.

Very truly yours,

Richard C. Trudeau

Richard C. Trudeau
General Manager

RCT/sg

STATE LANDS DIVISION

1807 13TH STREET
SACRAMENTO, CALIFORNIA 95814



September 12, 1975

W 20841

RECEIVED
SEP 15 1975
ALAMEDA COUNTY
PLANNING DEPARTMENT

Alameda County Planning Department
399 Elmhurst Street
Hayward, CA 94544

Gentlemen:

Subject: Solid Waste Management
Alameda County

We have reviewed the "Preliminary Draft, Solid Waste Management Plan and Draft Environmental Impact Report for Alameda County, August, 1975", and have no comment on its substance.

However, in the event any specific parcel of real property within the Bay estuary may come under consideration as a disposal site, we request that this office be advised. This will permit us to look into the question of whether the public may be the owner of existing property rights in the parcel by reason of its present or historical character as tidelands or submerged lands of the San Francisco Bay estuary.

Sincerely,

A handwritten signature in cursive script that reads 'Walter Cook'.

WALTER COOK
Staff Attorney

WC ng

cc: W. R. Atlee

DEPARTMENT OF TRANSPORTATION

P. O. BOX 3366 RINCON ANNEX
SAN FRANCISCO 94119

(415) 557-1840

RECEIVED
SEP 26 1975

September 23, 1975

04-Ala-Gen

Mr. William H. Fraley
Planning Director
Alameda County Planning Department
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Fraley:

This is in response to your referral of the Preliminary Draft,
Solid Waste Management Plan and Draft Environmental Impact Report
for Alameda County.

We have reviewed the plan and the report and consider them to be
adequate insofar as functions and responsibilities of the
Department of Transportation are concerned.

Very truly yours, .

T. R. LAMMERS
District Director

By

B. C. Bachtold
B. C. BACHTOLD
Deputy District Director

COMMENTS ON GEOLOGIC AND GROUND WATER ASPECTS
OF
SOLID WASTE MANAGEMENT PLAN AND DRAFT
ENVIRONMENTAL IMPACT REPORT FOR ALAMEDA COUNTY

Pages II-67 and II-68

The references to the possible effects of tsunamis on landfills in reclaimed tideland areas should be put into proper perspective. The maximum recorded wave height of a tsunami arriving at the Golden Gate since 1867 was 7.4 feet. The report's suggested tsunami with 20-foot runup at the Golden Gate Bridge is conjectural. However, if such an event did occur, it would be no more likely to saturate the soil cover of the existing modified sanitary landfills than a torrential rain.

Page II-69

It would be geologically and hydrologically impossible for leachate to reach the Centerville aquifer, as stated in the report, unless the Durham Road (Fremont) landfill were placed over an improperly abandoned well which was open to that aquifer.

Page III-3

The "Generalized Geologic and Ground Water Map of Alameda County" was prepared by the Department as a base map at a mile-to-the-inch scale as requested by the Alameda County Planning Department. The geologic details and notes were appropriate for that scale. Reduction of the map to the odd scale of 1:265,625 has rendered the map unreadable. The Alameda County portion of the State Geologic Map, Scale 1:250,000, could have been reproduced easily and inexpensively. The resulting map would have been readable and useful. The descriptive notes concerning water-bearing and nonwater-bearing units could easily have been modified to apply to map units at the published scale.

Page III-6

No reference was made to the Hayward Fault. This is a serious omission. The Hayward Fault was the source of damaging earthquakes and fault rupture in 1836 and 1868. Fault creep is now being monitored at several sites along the fault in Alameda County.

Paragraph 2, lines 9-11. "The most important factor in this formation is that, because of the varying permeability from layer to layer, ground water is in the aquifers." The statement should be deleted.

Paragraph 3, last four lines. The statement is misleading and should be deleted. "Decomposition materials" (leachate) from the landfills, if generated, would not penetrate the underlying clay layers to reach potable ground water.

Page III-7

Last paragraph. The first sentence is incorrect as written. The Livermore Valley is a structural downwarp between, not "along", the Calaveras and Greenville Faults (see DWR Bulletin 118-2, Appendix A, 1966).

Last line. Substitute "Tassajara Formation" for "Orinda and Neroly".

Footnote. Physiographic features listed after the reference are out of place.

Pages III-7 and 8

Several typographical errors and misused technical terms have been discussed with the author in the Alameda County Planning Division.

Page III-8

3rd paragraph, 2nd line. The word "intrusion" is inappropriate in this context. Substitute "outcrops" or "exposures".

3rd paragraph, last line. It is doubtful that you will find many particles in the water-bearing formations that are "yards" in diameter.

Footnote 4. The reference should be to Bulletin 118-2 as well as to its Appendix.

Page III-9

First three paragraphs. The relative significance of the listed faults is not indicated. Some are "active"; some are not. Several faults shown on the Geologic Map, Page III-3, have not been included in the list of named faults in the LAPU. Also, their positions relative to prominent physiographic features, and their extensions and interconnections in and around Livermore Valley, have been incorrectly described.

PACE

Political Action Coalition
for the Environment

509 Athol Street #3
Oakland, California 94606

October 2, 1975

00000

William E. Carpenter, Chairman, and Members
Alameda County Planning Commission
399 Elmhurst Street
Hayward, California 94544

Dear Chairman Carpenter and Members:

In its presentation to the Alameda County Planning Commission on September 25, 1975, the Political Action Coalition for the Environment recommended a single agency to carry out the administration and enforcement functions of the county solid waste management plan. Such an agency would have responsibility for project evaluation, planning, health and safety code enforcement, and financial and collection rate regulation (in cooperation with municipalities).

That recommendation is based upon two fundamental considerations. First, the Institutional and Financing Alternatives Report, submitted to the advisory committee July 10th makes it clear that fragmented public agencies cannot effectively monitor and regulate an industry dominated by one firm. As that report states, on page 16:

The political and organizational changes which must occur in the waste management system in Alameda County (public and private) must be tailored to fit the local situation. Part of this tailoring begins with the knowledge of how the system operates. For example, the majority of franchises (12) are held by one company in Alameda County. Thus, a near-monopoly has developed without a corresponding increase in comprehensive monitoring under one agency within the County. Comprehensive regulation to a large degree is lacking; for example, each agency concerned bases its inspection upon their own interests and jurisdictional limits, with no central coordinating point for environmental, health, and engineering problems. However, this situation, which will be changed because of SB-5 requirements, may be attributed to several factors. Primary among these is the recognition that an essential public service is being provided as a public convenience and necessity. Public spirited officials have, no doubt, selected the one scavenger company to avoid duplication in services and costs; in this situation, the company has flourished and expanded into many areas and markets. This has resulted in the elimination of the free-market condition locally in this industry. In the absence of the free-market situation, the public must have guarantees to insure that they will not be exploited. This is only one justification for

Wm. Carpenter
October 1, 1975 pg. 2

comprehensive regulation.

There is a second consideration. In the near future, technologically complex resource recovery operations will of necessity supplant the traditional method of disposal (sanitary landfill). In order to evaluate these technologies, complex economic, public health, environmental, and political judgments will have to be made. Fragmentation of public authority into several agencies is not conducive to effective public decision-making.

Comprehensive planning and regulation is best done by a single, politically accountable agency. This is particularly important when the agency is to safeguard the public interest in a \$17 to \$116 million system -- financed directly or indirectly by the consumer -- whose annual operating costs will soon exceed \$50 million.

Sincerely,

Louisa Jaskulski

Louisa Jaskulski

for

PACE SOLID WASTE MANAGEMENT
PLANNING COMMITTEE

cc:

Marc Herbert, Chair
Technical Advisory Committee
to Solid Waste Management
Plan Advisory Committee (TAC)

Hiram Wolch, Chair
Solid Waste Management Plan
Advisory Committee (SWMPAC)

October 2, 1975

RECEIVED
OCT 3 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

TO: Wes McClure, City Manager
FROM: W. R. Rugg, Community Development Director
SUBJ: Alameda County Solid Waste Management Plan

In accordance with the Nejedly-Z'berg-Dills Solid Waste Management and Resource Recovery Act of 1972, each county is now preparing a comprehensive solid waste management plan for submittal to the State Solid Waste Management Board by January 1, 1976. The law requires such plans to be consistent with the State Board's policy, including the Minimum Standards for Solid Waste Handling and Disposal. As a result, the county plans should provide that all solid waste handling and disposal activities occurring within the county shall be in compliance with the minimum standards.

Alameda County has delivered to each city in the County a Preliminary Draft of its proposed Solid Waste Management Plan combined with an EIR on the proposal. Each city has been asked to hold an informal public hearing on the Draft and, if it concurs in the proposals contained in it, adopt a resolution so stating. Comments and suggested changes submitted by cities will be considered by the County Planning Commission in preparing its final draft for submission to the State prior to January 1, 1976. Questions of clarification can perhaps be best directed to the County Planning staff, who prepared the Draft.

The County's Draft is a large, imposing document not available in large numbers, so we have prepared the attached summary for use by the City Council and the public at the October 6 public hearing. It contains all of the recommendations contained in the Draft.

The proposals in the County's Preliminary Draft Solid Waste Management Plan include two general issues that should be discussed thoroughly before any formal City concurrence with the Plan is undertaken. These issues are the following:

1. Administration

SB 5, the 1972 legislation that mandated preparation of a countywide solid waste management plan in every county, presupposes county implementation of those plans. Accordingly, the Alameda County draft plan proposes a County solid waste agency for overall administration and a joint exercise of powers agreement between the County, the cities and the sanitary districts providing for implementation of the Plan.

It is not clear where County authority would start and City authority would stop in such an arrangement, for instance, we might assume that if the City approved the application and the County denied it, there would be no transfer station. But if the City denied it and the County plan provided for it, what influence would the County have over the City's action? And how will a countywide plan work if every city has a veto power over transfer stations, energy generators and landfills?

One of the four elements with which the City is asked to concur in the sample resolution is "the role identified in the plan for the City in implementing this cooperative effort..." The Plan is vague on this important point. Somewhere, the Plan should define specifically what elements of solid waste management authority are to pass to the County and what elements are to be retained by the cities.

2. The "Plan"

The draft Plan makes no recommendations on specific facilities or sites. This omission seems necessary, for these are local zoning issues that must first be addressed locally. But without any suggestion as to what should go where, this is not a "plan" in the normal sense of the word, but instead, a set of policy statements. Presumably, someone will eventually have to develop a real plan that suggests a set of solid waste management facilities. It is not clear whether facilities planning is to be done by the proposed County agency, by private industry, or by cities, and to what extent cities will be obligated to accept these later plans when they are developed.

In addition to these two general issues, the Draft raises some specific questions that seem worthy of clarification. These are listed below, as quotes from the Draft, with the questions they raise in our minds. (Section references refer to items in pages 1 through 12 in the attached summary.

A., 2.

"Alameda County should seek funding to prepare specific plans for developing alternative disposal and recovery methods and financing. A technical group consisting of industry, public, and quasi-public agencies should continue to plan for innovative waste management techniques."

Question:

Is the development of alternative disposal and recovery methods a proper public function, or should it be undertaken by private industry subject to public review?

A., 4.

"Each city and the County should follow guiding principles in their respective conservation elements in the establishment of any solid waste management site or facility."

Question:

What are the "guiding principles" that each city should follow?

C., 1., d.

"Lower the cost of financing facilities for private industry through providing access to pollution control bond money."

Question:

If money is diverted from "pollution control" to solid waste management, what are the implications on the continued financing of sewage treatment facilities?

C., 2., c.

"State action is needed to provide loan guarantees, low-interest loans to local governments for construction of components of a full-scale regional system."

Question:

What is this "full-scale regional system" that local governments are to construct?

C., 2., e.

"The State should return a portion of tax revenues and other revenues derived from solid waste management activities to the local communities to aid local development and implementation of solid waste management systems."

Question:

What "tax revenues" are derived from solid waste management activities? What would be the implications of such a shift in tax subventions on present City revenue sources and the activities they fund?

C., 1., c., (2)

"Discourage specific types of single-use products (such as no-deposit, no-return beverage containers) through prohibitions against their manufacture or sale. (State and Federal, as well as local levels)

Question:

Isn't this beyond the control of "local levels"?

D., 2., a., (4)

"Quotas should be placed on production and importation of new paper, and the paper recycling industry should be subsidized to make use of recycled paper products economically attractive to the consumer.

Question:

There are basically three levels of incentives available to encourage the use of recycled products. In increasing order of severity, they are

- (1) remove the existing incentives and subsidies that encourage the development and use of virgin materials;
- (2) establish new incentives and subsidies to encourage the development and use of recycled products;
- (3) establish quotas or prohibitions on the use of virgin materials.

The question is, "How far down this list should we go at this time?"

D., 2., b., (3) and (4)

"Governmental agencies should be required to purchase products containing recycled materials. Such procurement policies would support markets for secondary materials." (Emphasis added)

"Public and quasi-public agencies should be urged to adopt procurement policies which require maximum feasible use of recycled materials in all supplies purchased. Such procurement policies would stimulate the recovery of recyclable materials." (Emphasis added)

Question:

These two recommendations seem inconsistent. Shouldn't one or the other be deleted, depending on the consensus on the preceding question?

E., 4., b.

"If maximum conservation of resources (including energy) is a primary goal, then materials in solid waste should be recovered through composting rather than converted to energy."

Comment:

This does not appear to make sense. It can be read as "if maximum conservation of energy is a primary goal, then materials or solid waste should be recovered through composting rather than converted to energy." If the intent

of this recommendation is to discourage energy generation, it seems doubtful that we know enough about the desirability or technology of energy recovery to adopt such a policy at this time.

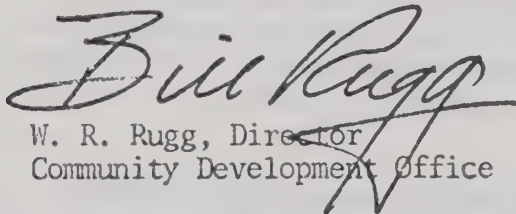
E., 4., c.

"Industry and individual companies should be encouraged to recover and reuse their own waste products through legal sanctions."

Comment:

We suggest changing the last three words to "with appropriate incentives."

In summary, we cannot relate the items with which we are asked to concur in the sample resolution with any specific provisions of the "Plan." We suggest asking the County to itemize for us under each of the four elements in the last paragraph of the draft resolution exactly what we are asked to concur in. The public hearing can be continued to October 20 to consider the clarifications that are provided.


W. R. Rugg, Director
Community Development Office

WRR:sd

Attachment

cc: L. Riordan
R. Randall
R. Ward
G. Forbes

ALAMEDA COUNTY PLANNING DEPARTMENT

399 Elmhurst Street, Hayward, California 94544

ph 783:5800

October 20, 1975

Mr. Wes McClure
City Manager
San Leandro, CA 94577

Dear Mr. McClure:

SUBJECT: Draft of Alameda County Solid Waste Management Plan

We appreciate your concerns voiced by you and the members of your council and hope the following responses to the questions in the memo of October 2, 1975 from W. R. Rugg, Director Community Development Office, on the Plan resolve the stated questions. The Plan is in conformance with State Policy and the State-wide Minimum Standards for Solid Waste Handling and Disposal apply to all operations irrespective of local preference. The Plan attempts to effectuate responsible implementation of those standards.

With respect to Plan Administration and Implementation, it would be preferable to apply the concept of joint participation in these responsibilities by all jurisdictions as the Plan clearly states (p. 1-8): that cities retain authority for collection and maintenance of their franchise. The city must also continue fulfilling its responsibilities in making land use decisions with regard to the location of new facilities. However, all new facilities should be designed and located based upon the flow of solid waste which may not exactly coincide with city boundaries. Responsibility for general location of facilities would be the responsibility of the Solid Waste Management Board. If either private capital or public capital were invested, the optimizing decisions would be made based upon waste generation and overall efficiencies. The role of the cities clearly is that of full participation in the countywide effort through the joint exercise of power agreement.

The problems associated with developing a facilities plan before establishing an intergovernmental structure for participation and policies are obvious. Local issues must also be resolved by the respective city. There is a strong feeling throughout the county to promote the private scavenger industry and allow them the widest latitude possible to develop the system. However, there is a requirement that facilities be in conformance with the Plan and this would include such tests as cost effectiveness, efficiency, resource recovery, geographic area served.

Response to specific comments on SWMP from City of San Leandro:

A., 2.

"Alameda County should seek funding to prepare specific plans for developing alternative disposal and recovery methods and financing. A technical group consisting of industry, public, and quasi-public agencies should continue to plan for innovative waste management techniques."

Question:

Is the development of alternative disposal and recovery methods a proper public function, or should it be undertaken by private industry subject to public review?

Staff Response:

The development of alternative disposal and recovery methods is very definitely a public function. S. B. 5 states that the primary responsibility for solid waste management and planning shall rest with local government. The County has been directed to explore solid waste management methods which will reduce the flow of wastes to landfill sites. The development of alternatives should be a subject undertaken with public involvement and discussion, since each city is involved with the need to reduce the flow of solid waste.

A., 4.

"Each city and the County should follow guiding principles in their respective conservation elements in the establishment of any solid waste management site or facility."

Question:

What are the "guiding principles" that each city should follow?

Staff Response:

The "guiding principles" are the policies contained in the Conservation Element of the City's General Plan.

C., 1., d.

"Lower the cost of financing facilities for private industry through providing access to pollution control bond money."

Question:

If money is diverted from "pollution control" to solid waste management, what are the implications on the continued financing of sewage treatment facilities?

Staff Response:

The important word is "bond". Statement does not anticipate diverting funds from pollution control. Pollution control bonds have attractive interest rates and are one form of borrowed money.

C., 2., c.

"State action is needed to provide loan guarantees, low-interest loans to local governments for construction of components of a full-scale regional system."

Question:

What is this "full-scale regional system" that local governments are to construct?

Staff Response:

The full-scale regional system needed to achieve effective resource recovery would consist of materials processing, materials recovery, and energy recovery facilities. It is anticipated to be expensive, especially the energy recovery components. While private industry is capable of effectively managing labor-intensive parts of the system, sophisticated materials processing and energy recovery facilities will probably need public financing because of the large capital requirements. The lower interest rates make public financing attractive.

C., 2., e.

"The State should return a portion of tax revenues and other revenues derived from solid waste management activities to the local communities to aid local development and implementation of solid waste management systems."

Question:

What "tax revenues" are derived from solid waste management activities? What would be the implications of such a shift in tax subventions on present City revenue sources and the activities they fund?

Staff Response:

This policy anticipates revenues being derived from future taxes on packaging materials, virgin materials, and non-returnable containers which would be designed to decrease litter and/or increase the use of secondary materials. The State is currently studying such legislative ideas. No tax revenues are presently derived directly from Solid Waste Management activities; if such revenues are realized, they should be shared with local government.

C., 1., c., (2)

"Discourage specific types of single-use products (such as no-deposit, no-return beverage containers) through prohibitions against their manufacture or sale. (State and Federal, as well as local levels)

Question:

Isn't this beyond the control of "local levels"?

Staff Response:

This is not beyond local control. Berkeley is presently examining beverage container

legislation. The concept can be applied at the local level, and has been in other states.

D., 2., a., (4)

"Quotas should be placed on production and importation of new paper, and the paper recycling industry should be subsidized to make use of recycled paper products economically attractive to the consumer."

Question:

There are basically three levels of incentives available to encourage the use of recycled products. In increasing order of severity, they are

- (1) remove the existing incentives and subsidies that encourage the development and use of virgin materials;
- (2) establish new incentives and subsidies to encourage the development and use of recycled products;
- (3) establish quotas or prohibitions on the use of virgin materials.

The question is, "How far down this list should we go at this time?"

Staff Response:

The City of San Leandro should discuss whether the public should be encouraged to use recycled products. This is an opportunity to apply pressure to the market through consumer demand at the local level rather than having something imposed by State or Federal laws.

D., 2., b., (3) & (4)

"Governmental agencies should be required to purchase products containing recycled materials. Such procurement policies would support markets for secondary materials." (Emphasis added)

"Public and quasi-public agencies should be urged to adopt procurement policies which require maximum feasible use of recycled materials in all supplies purchased. Such procurement policies would stimulate the recovery of recyclable materials." (Emphasis added)

Question:

These two recommendations seem inconsistent. Shouldn't one or the other be deleted, depending on the consensus on the preceding question?

Staff Response:

The two recommendations could be joined and clarified. One states that some amount of recycled products be used. The other quantifies this to say a maximum feasible amount should be used. One approaches the problem as administrative and the other through policy established by the legislative body.

E., 4., b.

"If maximum conservation of resources (including energy) is a primary goal, then materials in solid waste should be recovered through composting rather than converted to energy." If the intent of this recommendation is to discourage energy generation, it seems doubtful that we know enough about the desirability or technology of energy recovery to adopt such a policy at this time.

Staff Response:

This recommendation recognizes that there is greater energy efficiency associated with composting than with known systems of energy recovery. Both composting and energy recovery processes have advantages and disadvantages, and this policy reflects the advantage composting has over energy recovery. While maximum conservation of resources may be a primary goal, it is not the only goal in that it may be impossible to achieve due to marketing problems.

E., 4., c.

"Industry and individual companies should be encouraged to recover and reuse their own waste products through legal sanctions."

Comment:

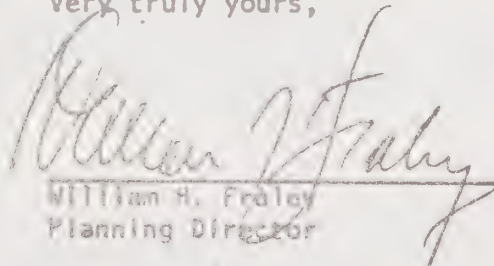
We suggest changing the last three words to "with appropriate incentives."

Staff Response:

Appropriate incentives includes legal sanctions, for example, tax credits.

Finally, please refer to my letter of October 1, 1975 and model resolution developed by staff which outlines the elements of concurrence and gives your council considerable latitude in approval of the concepts in the Plan. After this review period, The revised Plan will again be referred to you.

Very truly yours,


William H. Fraley
Planning Director

CITY OF BERKELEY
CALIFORNIA

R. C. GAZLAY, DIRECTOR OF SERVICES

RECEIVED
OCT 3 1975

October 2, 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

Mr. Ron Eggers
Alameda County Planning Department
399 Elmhurst
Hayward, California

Dear Ron:

In reviewing the draft Solid Waste Management Plan for Alameda County, our staff has been unable to find answers to several questions, and offers the following comment. Our Solid Waste Management Commission has not yet responded.

The summary should be revised to at least mention or list the many substantive recommendations contained elsewhere in the report. As it is now, the first section is more of a preface than a summary.

Pages I-4 through I-6. The Solid Waste Advisory Committee is now recommending alternative 1980-C and 1990-C. The table on page I-6 indicates that these are cheaper than alternatives B. What interest rate was assumed in amortizing the capital investment? Where would the new capital come from? General obligation bonds are not easily approved. What facilities are assumed needed to meet the 60% and 90% recovery goals?

Page I-7, paragraph 3. Composition of the Joint Powers Board needs clarification. Will Berkeley have proportional representation on the Board? Do cities, special districts, and the county each have the same number of members to appoint? Since cities include the great majority of residents in the county, representation on the board should reflect that fact.

Page I-8, paragraph 3 under Management/Operations. Fourth sentence says that the public might be encouraged or required to separate wastes for collection. Recommend deleting the words "or required."

Section VI is in outline form difficult for the layman to understand. Some of the material in this section would seem to be of questionable value. Pages VI 53 and VI 58, for example, might well be left out since that type of data is available in background reports.

Section VII is very complex and difficult to understand. Would it be possible to reorganize it in a simpler, logical fashion?

Page VIII-11, paragraph 7. Change "required" to "encouraged" or "urged." Berkeley would prefer to strive for such purchasing under its own policy

rather than through federal mandate.

Page VIII-16, paragraph 1 under Policy Recommendations. This is vague. What guiding principles are envisioned?

Page VII-18, paragraph 2. Not all solid waste considerations are regional in scope. Financing of collections should remain at the local level.

Page VIII-19, top of page. What tax revenues and other revenues does the state derive from solid waste management activities? Are additional taxes on solid waste collection for disposal anticipated?

Page VIII-23, paragraph 2. Under Policy Recommendations says counties should work with the regional government. As yet we have no regional government.

Page VIII-23, section VII, paragraph 1 under Policy Recommendations. Should specify the appropriate county agency which should continue with the solid waste planning effort.

What is the scope of the plan activities for which complete participation is considered mandatory by all jurisdictions?

The plan provides a comprehensive set of alternative systems including some detailed cost estimates. A general evaluation of the solid waste management situation can be made using this information, but to make a cost benefit analysis of the alternative systems from Berkeley's point of view, we need to know how costs and credits of the various systems could be allocated among the agencies within the county.

Very truly yours,



R. C. Gazlay
Assistant Director of Public Works

RCG:ep

cc: Director of Comprehensive Planning
Assistant City Manager

ALAMEDA COUNTY PLANNING DEPARTMENT

399 Elmhurst Street, Hayward, California 94544

ph ~~700-5800~~
881-6401

October 21, 1975

Mr. R. C. Gazlay
Assistant Director of Public Works
City of Berkeley
2134 Grove Street
Berkeley, CA 94704

Dear Mr. Gazlay:

SUBJECT: Response to City of Berkeley Comments to Draft Alameda County Solid Waste Management Plan

The following comments are in response to questions raised in your October 2, 1975 letter regarding the draft County Solid Waste Management Plan:

Pages 1-4 through 1-6. The Solid Waste Advisory Committee is now recommending alternative 1980-C and 1990-C. The table on page 1-6 indicates that these are cheaper than alternatives B. What interest rate was assumed in amortizing the capital investment? Where would the new capital come from? General obligation bonds are not easily approved. What facilities are assumed needed to meet the 60% and 90% recovery goals?

Staff Response:

The interest rate used in amortizing the capital investment was 10% of capital cost (pp. VI-9, 13) for transfer station and materials processing facility. The Ralph M. Parsons Company in the EBERRS Feasibility Study Report based their financing costs on annual rates of interest of 6% for public financing and 9.5% for private financing. New capital could come from State General Obligation Bonds, State Revenue Bonds, Local General Obligation Bonds, and/or Local Revenue Bonds (p. VIII-26). A fund acquisition/financing program is to be developed during plan implementation. In order to meet the 60% and 90% resource recovery goals, materials processing and energy recovery facilities will be needed.

Page 1-7, paragraph 3. Composition of the Joint Powers Boards needs clarification. Will Berkeley have proportional representation on the Board? Do cities, special districts, and the county each have the same number of members to appoint? Since cities include the great majority of residents in the county, representation on the board should reflect that fact.

Staff Response:

The composition of the Joint Powers Board is proposed by the SWMP Advisory Committee to consist of elected officials (9), two from each of the four planning units and one appointed by the Board of Supervisors. The City of Berkeley is encouraged to comment on this proposal and suggest other alternatives which are preferred.

Page 1-8, paragraph 3 under Management/Operations. Fourth sentence says that the public might be encouraged or required to separate wastes for collection. Recommend deleting the words "or required."

Staff Response:

Words "or required" were included in order to keep options open for materials recovery efforts by any city or group. Has not yet been determined that source separation is successful for some industries and individual households, and it is still under study in the U.S. for community-wide application.

Section VI is in outline form difficult for the layman to understand. Some of the material in this section would seem to be of questionable value. Pages VI 53 and VI 58, for example, might well be left out since that type of data is available in background reports.

Staff Response:

"Economic Analysis and Feasibility-Technology" is vital in meeting the requirements of SB-5. The plan must examine and consider components of the solid waste system, both existing and future, and must emphasize resource recovery. The information is important in assessing alternative solid waste management systems.

Section VIII is very complex and difficult to understand. Would it be possible to reorganize it in a simpler, logical fashion?

Staff Response:

This section is set up in a very logical order. First the goals and objectives of the Plan Advisory Committee are stated and then findings from the background reports developed by staff and the Technical Advisory Committee and then these are followed by policy recommendations. All are meaningful in the development of the policies. A section containing only the Plan policies is being prepared for distribution and addition to the Plan.

Page VIII-11, paragraph 7. Change "required" to "encouraged" or "urged." Berkeley would prefer to strive for such purchasing under its own policy rather than through federal mandate.

Staff Response:

The City is probably already using paper containing recycled materials. But it is important to have all local government demanding and purchasing high quality goods containing secondary materials under its own policy. Public agencies should be required to purchase recycled products where appropriate.

Page VIII-16, paragraph 1 under Policy Recommendations. This is vague. What guiding principles are envisioned?

Staff Response:

The principles and policies are contained in each city's conservation element of their general plan.

Page VIII-18, paragraph 2. Not all solid waste considerations are regional in scope. Financing of collection should remain at the local level.

Staff Response:

We agree, and it is clearly stated in the Plan on page I-8, #2, Management/Operations, that all aspects of collection should be handled at the local level by each city. However, since the generation, flow, and disposal of solid waste generally does not recognize jurisdictional boundaries, the countywide plan focuses on solid waste as a Countywide/regional problem. Collection is only one aspect of a solid waste management system, which also includes transfer, processing for materials recovery, etc. The policy of local jurisdictional control also includes the principle that financing of capital intensive energy recovery systems should be supported through State or local G. O. or Revenue Bonds. Financing of plan implementation could occur through a nominal charge of 50¢ to \$1.00 per year per household on the garbage bill or through a $\frac{1}{2}$ - 1¢ increase in the property tax rate as suggested by the Plan Advisory Committee. However, final decisions about financing should be made by the Joint Powers Board (County SW Management Board) after it is formed.

Page VIII-19, top of page. What tax revenues and other revenues does the state derive from solid waste management activities? Are additional taxes on solid waste collection for disposal anticipated?

Staff Response:

The State is not deriving revenues directly from solid waste management activities at the present time. This policy anticipates that tax revenues may be generated from beverage container and packaging legislation. Other legislation which urges use of secondary materials through tax levies on virgin materials, excess packaging, etc., could also generate revenues. Any monies obtained by the State from SW management activities should be shared with or returned to local communities for support of local programs.

Page VIII-23, paragraph 2. Under Policy Recommendations says counties should work with the regional government. As yet we have no regional government.

Staff Response:

Page VIII-23, paragraph 2. "Regional government" should read Association of Bay Area Governments.

Page VIII-23, section VII, paragraph 1 under Policy Recommendations. Should specify the appropriate county agency which should continue with the solid waste planning effort.

Staff Response:

Page VIII-23, section VII, paragraph 1. The appropriate county agency is further defined on pp. 1-7, 8 and in the SWMPAC's recommendation. The concepts which are presented for the concurrence of city councils is that of a joint powers board which will handle plan policy and implementation; enforcement will be the responsibility of the County Health Care Services Agency under a separate commission. The staff recommendation differs from that of the Plan Advisory Committee in that staff function would be assigned to existing county agencies with one joint powers board deciding policy and regulatory issues.

What is the scope of the plan activities for which complete participation is considered mandatory by all jurisdictions?

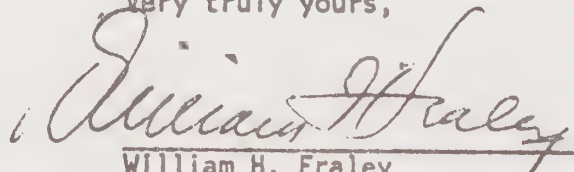
The plan provides a comprehensive set of alternative systems including some detailed cost estimates. A general evaluation of the solid waste management situation can be made using this information, but to make a cost benefit analysis of the alternative systems from Berkeley's point of view, we need to know how costs and credits of the various systems could be allocated among the agencies within the county.

Staff Response:

It is assumed that the degree of the City of Berkeley's participation in plan implementation will be proportional to the City's concern with solid waste problems and with representation in the decision-making process for countywide solid waste management. The opportunity for deriving greatest benefit from urban waste is high in the metropolitan bay area if cooperative agreements and financing mechanisms can be applied. There is enough garbage in the area from Hayward to Albany today to provide energy for 30,000+ households, possibly at competitive prices. There seems to be a clear mandate both in SB5 and among members of this community to exploit this resource for energy or organic nutrients.

Private industry is presently doing the lion's share of collection and disposal in this county. While each city perceives a vested responsibility for garbage services, the fiscal responsibilities will also rest both with the city (special district) or the joint powers board. Costs and credits, therefore, should be allocated based upon system costs and user charges, so that users of the service benefit as much as is practical.

Very truly yours,



William H. Fraley
Planning Director

WHF:lc

DEPARTMENT OF WATER RESOURCES

CENTRAL DISTRICT

3251 S STREET

P. O. Box 9137

SACRAMENTO

95816

(916) 445-5631



OCT 3 1975

Mr. William H. Fraley
Planning Director
Alameda County Planning Department
399 Elmhurst Street
Hayward, California 94544

Dear Mr. Fraley:

Thank you for letting us review the preliminary draft "Solid Waste Management Plan and Draft Environmental Impact Report for Alameda County". The attached comments are limited to the geologic and ground water aspects of the report.

Sincerely,

A handwritten signature in cursive script that reads 'Wayne MacRostie'.

Wayne MacRostie
Chief

Attachment

cc: Mr. Mun J. Mar
Chief of Water Resources Branch
Alameda County Flood Control and
Water Conservation District
399 Elmhurst Street
Hayward, California 94544

COMMENTS ON GEOLOGIC AND GROUND WATER ASPECTS
OF
SOLID WASTE MANAGEMENT PLAN AND DRAFT
ENVIRONMENTAL IMPACT REPORT FOR ALAMEDA COUNTY

Pages II-67 and II-68

The references to the possible effects of tsunamis on landfills in reclaimed tideland areas should be put into proper perspective. The maximum recorded wave height of a tsunami arriving at the Golden Gate since 1867 was 7.4 feet. The report's suggested tsunami with 20-foot runup at the Golden Gate Bridge is conjectural. However, if such an event did occur, it would be no more likely to saturate the soil cover of the existing modified sanitary landfills than a torrential rain.

Page II-69

It would be geologically and hydrogically impossible for leachate to reach the Centerville aquifer, as stated in the report, unless the Durham Road (Fremont) landfill were placed over an improperly abandoned well which was open to that aquifer.

Page III-3

The "Generalized Geologic and Ground Water Map of Alameda County" was prepared by the Department as a base map at a mile-to-the-inch scale as requested by the Alameda County Planning Department. The geologic details and notes were appropriate for that scale. Reduction of the map to the odd scale of 1:265,625 has rendered the map unreadable. The Alameda County portion of the State Geologic Map, Scale 1:250,000, could have been reproduced easily and inexpensively. The resulting map would have been readable. The descriptive notes concerning water-bearing and nonwater-bearing units could easily have been modified to apply to map units at the published scale.

Page III-6

No reference was made to the Hayward Fault. This is a serious omission. The Hayward Fault was the source of damaging earthquakes and fault rupture in 1836 and 1868. Fault creep is now being monitored at several sites along the fault in Alameda County.

Paragraph 2, lines 9-11. "The most important factor in this formation is that, because of the varying permeability from layer to layer, ground water is in the aquifers." The statement should be deleted.

Paragraph 3, last four lines. The statement is misleading and should be deleted. "Decomposition materials" (leachate) from the landfills, if generated, would not penetrate the underlying clay layers to reach potable ground water.

Page III-7

Last paragraph. The first sentence is incorrect as written. The Livermore Valley is a structural downwarp between, not "along", the Calaveras and Greenville Faults (see DWR Bulletin 118-2, Appendix A, 1966).

Last line. Substitute "Tassajara Formation" for "Orinda and Neroly".

Footnote. Physiographic features listed after the reference are out of place.

Pages III-7 and 8

Several typographical errors and misused technical terms have been discussed with the author in the Alameda County Planning Division.

Page III-8

3rd paragraph, 2nd line. The word "intrusion" is inappropriate in this context. Substitute "outcrops" or "exposures".

3rd paragraph, last line. It is doubtful that you will find many particles in the water-bearing formations that are "yards" in diameter.

Footnote 4. The reference should be to Bulletin 118-2 as well as to its Appendix.

Page III-9

First three paragraphs. The relative significance of the listed faults is not indicated. Some are "active"; some are not. Several faults shown on the Geologic Map, Page III-3, have not been included in the list of named faults in the LAPU.

OCT 10 1975

SOLID WASTE MANAGEMENT PLAN

ALAMEDA COUNTY
PLANNING DEPARTMENT

Area of Concern: The proposed Solid Waste Management Plan may lead to the elimination or reduction of the present private contractors and result in an increase in public employment. The following questions are directed to this area.

- a. Will the entry of government into any hitherto private field of solid waste management/operations/funding of capital and research projects be placed before the electorate? And on what basis?
- b. What are the labor ramifications of government's entry into solid waste operations, in light of Eastern cities' experiences?
- c. Does the solid waste management plan consider potential labor problems to public agencies resulting from organized labor groups?
- d. Under the present system of collection and disposal is the sanitary land fill a long-term alternate for the South County area?

Area of Concern: The proposed policies (Pg. 1-6) are vague. The following questions should clarify these policies.

- a. Pg. 1-6, Item 1 conflicts with Item 4, Pg. 1-7. Please clarify. Item 1 indicates the City has the responsibility whereas Item 4 assigns responsibility to the County Health Department. Which agency has the responsibility?
- b. Pg. 1-7, Item 1. On what basis is the joint powers agreement satisfied? (By a majority of the cities, by all cities, separate agreements for each city.)
- c. Pg. 1-7, Item 7. Who does the audit? When? And who pays for the audit?
- d. Are the population projections used to determine the amount of solid waste material based on the ABAG population projections?
- e. Pg. 1-8, Legal and Legislation, Policy #2. Who will administer and fund the County-wide based litter control and bottle bill?

Area of Concern: The plan may result in the proposal or adoption of a regulation or law to reduce the amount of, or change, the collection procedures for collecting solid waste material. The following questions are directed towards this area.

- a. Pg. VIII-9. Will the amount of material entering the solid waste stream be reduced, and if so, under what procedure?
- b. What impact will adoption of the plan have at the State and Federal level?
- c. Will the adoption of the plan lead to proposed legislation in the environmental area at the State and Federal level?
- d. Who will set the standards for the percentage of the solid waste material to be recovered at the resource recovery facilities?

10/3/75

NEWARK

SOLID WASTE MANAGEMENT PLAN

Area of Concern: The ramifications of the proposal are not clear. The following questions should help clarify some of the possible ramifications of the proposed plan.

- a. Pg. 1-6, Item 1. Planning in unincorporated area done by County - who does this in cities?
- b. Pg. 1-6, Item 1. Who pays for the County staff and plan administration, and on what basis?
- c. Pg. 1-7, Item 3. Who appoints, pays for (and on what basis) the County Waste Management Program Coordinator?
- d. Pg. 1-7, Item 2. Will local approval of the Solid Waste Management Plan establish a timetable to execute a joint-powers agreement?
- e. Pg. 1-7, Item 3. What is the present organization and responsibility of the Joint Refuse Rate Commission?
- f. Will the local agencies be able to veto decisions of the Joint Powers Board in their jurisdiction?
- g. What powers will the Joint Powers Board have over County and local solid waste administrators and coordinators?
- h. Will this proposal result in an increase in our existing tax or a new property tax?
- i. Pg. 1-8, Management-Operations Policy #2. What weight will the County Waste Management Board carry in evaluating and recommending sites for new facilities?
- j. Will the adoption of the proposed plan result in legislation to require users to separate solid waste material prior to pickup?

SOLID WASTE MANAGEMENT PLAN

Area of Concern: Adequate economic consideration may not have been given to the proposed plan. The following questions should develop information relating to the economics.

- a. Pg. 1-5. Which alternative system would be less expensive for Newark and still satisfy State requirements?
- b. Have possible loss of franchise revenues and added administrative and planning research costs been figured into the plan?
- c. Will there be adequate markets for recovered materials and energy from new facilities? Will private industry/government be qualified to deal in them?
- d. Pg. VIII-17. In consideration of total cost why isn't reference made to the cost to the public in terms of loss of taxes and higher interest rates for privately placed funds?
- e. Have any studies been made to determine the desirability of having a public agency or a private agency handle collection of solid waste material?
- f. Are public agencies more efficient than private companies?
- g. Is the total cost to the public including the loss of taxes or benefit, etc. greater than with a private company or a public agency?
- h. Is the primary reason for recommending a County-operated energy recovery facility based on the availability of capital?
- i. Will the capital necessary to construct the processing and energy recovery facility require passage of a bond issue? Pg. 1-9, Research and Planning Policy #3.
- j. What are the prospects for Federal and State funding of private industries' capital and research projects? Pg. VIII-9, Findings-Legislation Nos. 3 & 4.
- k. Pg. V-15. The resource recovery system will not be self-sustaining as an economic operation under the conditions used for the plan. Why is this system proposed if it is not economically feasible? Who will subsidize the resource recovery system?

SOLID WASTE MANAGEMENT PLAN

Area of Concern: There is some question as to the benefits to the South County area. The following questions should develop information on the benefits to this area.

- a. Will the Solid Waste Management Plan increase or decrease the cost of solid waste disposal to the South County residents?
- b. To what extent will the South County have to finance any solid waste facilities (material and energy recovery facilities) for the North County area? (Facilities may be started in North County in 1980, South County in 1990, Pg. 1-5 Table.)
- c. Can we expect financial aid from North County when 1990-C is implemented (Pg. 1-5 - two processing facilities and one energy recovery facility).
- d. Who sets local collection rates?
- e. Why should the South County agencies change their current method of solid waste disposal?
- f. Pg. 6-28. Will the City lose revenue by the loss of the franchise fee?
- g. Will the South County cities participate in the cost of the transfer station and/or long haul facilities necessary for the North County Area?
- h. Is it possible to continue the present solid waste system with a minimum of regulations and modifications to meet State requirements?
- i. How will any revenues from any publicly owned transfer/processing/recovery facilities be distributed?

ALAMEDA COUNTY PLANNING DEPARTMENT

399 Elmhurst Street, Hayward, California 94544

ph 783:5800

October 20, 1975

Mr. Charles Cashmark
Planning Director
Planning Commission
City Hall
Newark, CA 94560

Dear Mr. Cashmark:

SUBJECT: Areas of Concern and Questions Regarding the Draft Alameda County
Solid Waste Management Plan

We have reviewed the questions referred to us by the Newark City Council and have prepared the following staff comments to assist the Council in discussions of the Plan:

Area of Concern: The proposed Solid Waste Management Plan may lead to the elimination or reduction of the present private contractors and result in an increase in public employment. The following questions are directed to this area.

- a. Will the entry of government into any hitherto private field of solid waste management/operations/funding of capital and research projects be placed before the electorate? And on what basis?
- b. What are the labor ramifications of government's entry into solid waste operations, in light of Eastern cities' experiences?
- c. Does the solid waste management plan consider potential labor problems to public agencies resulting from organized labor groups?
- d. Under the present system of collection and disposal is the sanitary landfill a long-term alternate for the South County area?

Staff Response:

- a) b) There is nothing in the Plan that would suggest any reduction in the present level of activity by the private scavenger companies in Alameda County. Collection is a labor intensive operation and will probably best be managed under the competitive conditions not found in public operations. This situation where competition is encouraged should be promoted and protected by adequate regulation by each city so that each homeowner or business receives the service paid for. On the other hand capital intensive programs for either materials or energy recovery could be publically financed and leased back to private industry with guaranteed financing. But this decision to finance and/or operate this type of facility should be made in the future after an adequate

and acceptable Countywide intergovernmental structure for solid waste management has been formed.

- c) The development of contingency plans for such emergencies as labor disputes (public or private) is to be undertaken during plan implementation. The Advisory Committee (during discussion of institutional alternatives) felt that labor problems apply equally to public and private industry.
- d) Military landfill is not envisioned as a long-term solution for the South County's refuse because landfill on the shorelines of the Bay would be in conflict with the Solid Waste Plan's and the State's policies towards resource recovery and with local and areawide plans regarding appropriate uses for bay lands.

Area of Concern: The proposed policies (pg. 1-6) are vague. The following questions should clarify these policies.

- a. Pg. 1-6, Item 1 conflicts with Item 4, Pg. 1-7. Please clarify. Item 1 indicates the City has the responsibility whereas Item 4 assigns responsibility to the County Health Department. Which agency has the responsibility?
- b. Pg. 1-7, Item 1. On what basis is the joint powers agreement satisfied? (by a majority of the cities, by all the cities, separate agreements for each city.)
- c. Pg. 1-7, Item 7. Who does the audit? When? And who pays for the audit?
- d. Are the population projections used to determine the amount of solid waste material based on the ABAG population projections?
- e. Pg. 1-8, Legal and Legislation, Policy #2. Who will administer and fund the County-wide based litter control and bottle bill?

Staff Response:

- a) The apparent conflict has been resolved by the recommendation of the Plan Advisory Committee. Implementation, administration and policy would be the responsibility of the Joint Powers Board while regulation and enforcement is assigned to the Health Care Services Agency. The County Health Department has responsibility in the County and contract cities (all except Albany and Berkeley) for enforcement of State and local codes regarding health and safety, including waste management.
- b) The joint powers agreement concept for countywide solid waste management was envisioned to include all cities (13). A countywide plan is required by State Law, and the joint powers agreement would insure that all the cities would be represented in and provide input to ongoing solid waste management.
- c) All jurisdictions contracting for refuse removal service should be responsible for auditing the franchisee's financial records. The Joint Powers Agency staff would be available to assist the cities if requested. Frequency of the audit pertains to the desires of each jurisdiction and the cost is borne by the city. Audits are usually performed when rate increase are requested.
- d) Population projections are from the Alameda County Planning Department, developed independently of ABAG.

October 20, 1975

Page 3

- e) Questions regarding funding and administration of any litter control and bottle bill are premature. The policy calls for further study and evaluation, not implementation.

Area of Concern: The plan may result in the proposal or adoption of a regulation or law to reduce the amount of or change the collection procedures for collecting solid waste material. The following questions are directed towards this area.

- a. Pg. VIII-9: Will the amount of material entering the solid waste stream be reduced and if so, under what procedure?
- b. What impact will adoption of the plan have at the State and Federal level?
- c. Will the adoption of the plan lead to proposed legislation in the environmental area at the State and Federal level?
- d. Who will set the standards for the percentage of the solid waste material to be recovered at the resource recovery facilities?

Staff Response:

- a) It is not known at this time whether the amount of material entering the solid waste stream will be reduced significantly. This will depend on legislation at Federal, State, and local levels (to discourage such things as no return bottles, excessive packaging, and some single-use items, for example) and by local efforts to recycle and source separate newsprint and aluminum cans, for example.
- b) The Plan's impact would be to accomplish stated solid waste policies of the State Solid Waste Management Board. Impact at Federal level cannot be determined at this time.
- c) It cannot be determined at this time if it will lead to proposed legislation at State and Federal levels.
- d) The State requires the quantities of wastes going to landfills to be reduced by 25% by 1980. The Countywide waste management agency will set recovery standards for facilities which are consistent with State Standards and which are technically feasible.

Area of Concern: The ramifications of the proposal are not clear. The following questions should help clarify some of the possible ramifications of the proposed plan.

- a. Pg. I-6, Item 1. Planning in unincorporated area done by County - who does this in cities?
- b. Pg. I-6, Item 1. Who pays for the County staff and plan administration, and on what basis?
- c. Pg. I-7, Item 3. Who appoints, pays for (and on what basis) the County Waste Management Program Coordinator?

- d. Pg. 1-7, Item 2. Will local approval of the Solid Waste Management Plan establish a timetable to execute a joint-powers agreement?
- e. Pg. 1-7, Item 3. What is the present organization and responsibility of the Joint Refuse Rate Commission?
- f. Will the local agencies be able to veto decisions of the Joint Powers Board in their jurisdiction?
- g. What powers will the Joint Powers Board have over County and local solid waste administrators and coordinators?
- h. Will this proposal result in an increase in our existing tax or a new property tax?
- i. Pg. 1-8, Management-Operations Policy #2. What weight will the County Waste Management Board carry in evaluating and recommending sites for new facilities?
- j. Will the adoption of the proposed plan result in legislation to require users to separate solid waste material prior to pickup?

Staff Response:

- a) Planning in the cities is accomplished by the planning and zoning departments in most cases; the titles vary with each city.
- b) c) h) County staff and plan administration has been estimated by the Plan Advisory Committee to cost from \$.50 to \$1.00 per household per year or 0.5¢ to 1.0¢ on the County property tax rate. The budget for plan administration, including the coordinator, is estimated at \$150,000 to \$300,000 per year.
- d) At present, no timetable has been established for execution of a joint powers agreement.
- e) The organization and responsibility of the Joint Refuse Rate Committee is described on page 11-66.
- f) g) i) The proposed Joint Powers Board decisions will not apply to local jurisdictions' collection and franchising activities, and it probably will not determine specific sites for facilities although any proposals for sites by industry and jurisdictions must conform to plan policies of cost effectiveness, environmental soundness, efficiency, and need. The Board will focus its planning and implementation on countywide concerns - processing, materials and energy recovery, and residuals and special wastes disposal; policy; public information; and financing.
- j) The adoption of the proposed plan will not result in legislation to require users to separate solid waste prior to pickup. Separation needs further study, and a decision on separation prior to pickup would be left to each individual jurisdiction.

Area of concern: Adequate economic consideration may not have been given to the proposed plan. The following questions should develop information relating to the economics.

- a. Pg. 1-5. Which alternative system would be less expensive for Newark and still satisfy State requirements?

- b. Have possible loss of franchise revenues and added administrative and planning research costs been figured into the plan?
- c. Will there be adequate markets for recovered materials and energy from new facilities? Will private industry/government be qualified to deal in them?
- d. Pg. VIII-17. In consideration of total cost why isn't reference made to the cost to the public in terms of loss of taxes and higher interest rates for privately placed funds?
- e. Have any studies been made to determine the desirability of having a public agency or a private agency handle collection of solid waste material?
- f. Are public agencies more efficient than private companies?
- g. Is the total cost to the public including the loss of taxes or benefit, etc. greater than with a private company or a public agency?
- h. Is the primary reason for recommending a County-operated energy recovery facility based on the availability of capital?
- i. Will the capital necessary to construct the processing and energy recovery facility require passage of a bond issue? Pg. I-9, Research and Planning Policy #3.
- j. What are the prospects for Federal and State funding of private industries' capital and research projects? Pg. VIII-9, Findings-Legislation Nos. 3 & 4.
- k. Pg. V-15. The resource recovery system will not be self-sustaining as an economic operation under the conditions used for the plan. Why is this system proposed if it is not economically feasible? Who will subsidize the resource recovery system?

Staff Response:

- a) No capital cost differences for the Washington Planning Unit (Fremont, Newark, Union City) are evident among the alternatives for 1980. For 1990, capital costs vary from \$13.73 million to \$11.53 million. Alternative 1990-C capital costs are \$12.22 million for the WPU. It is suggested that Newark review Sections V and VI of the Plan for an understanding of these costs.
- b) It has not been demonstrated that the cities would lose franchise revenues. Administrative and planning costs are not figured into system costs. These were estimated at \$.50 to \$1.00 per household per year.
- c) Markets for recovery materials may need to be developed in the future. There is an unquestionable market for energy from all sources in the future. Private industry and government alike are qualified to deal with resource recovery.
- d) The tax-exempt status of public organizations does not result in a cost to the public because of loss of taxes. Public agencies do not make profits which are removed from the community; such profits are returned to local government revenues if they are made. (The City's question (d.) is unclear.)

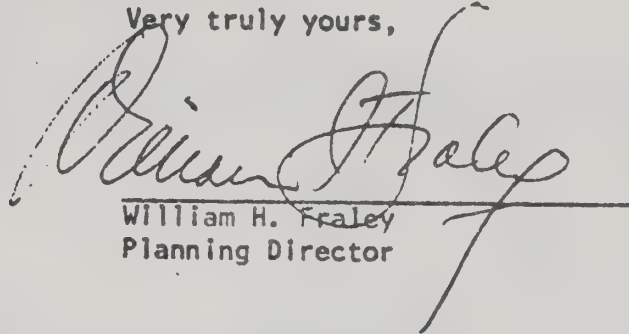
- e) f) There are many studies available on public vs. private collection, and efficiency depends on local conditions. Public or private operation must be decided based on local needs and conditions.
- g) Total cost of the waste system to public is greater with private financing/ownership of capital intensive projects, i.e. materials processing and energy recovery. Any land acquisition costs for private industry will be passed along to the user via collection and disposal service rates.
- h) The Plan does not, at this time, propose County ownership and operation of any facilities.
- i) It is possible that a bond issue will be needed to finance a materials processing/energy recovery facility.
- j) Without new legislative programs, there is little prospect for Federal or State funding of private industries' capital, and research projects.
- k) It has not been established that the resource recovery system is not economically feasible. Users of the existing system pay a user charge. Local taxes presently pay for administrative costs for rate reviews, enforcement, planning, etc. The existing system is not self-sustaining. Neither will the credits obtained from resource recovery offset all costs. User charges and tax revenues will be needed with any solid waste system.

Staff Response:

- a) It is inevitable that costs of solid waste disposal will increase. Therefore, any plan for South County residents will increase costs, even the present system. The question is, however, will the increase in costs be invested wisely in resource and energy conservation projects or just to bury in landfills. A quick perusal of the table on page 1-6 will show that the increase in cost per ton to recover energy and resources is insignificant when compared to not changing the present system at all.
- b) c) The South County will not be expected to finance facilities of any kind in North County and vice versa.
- d) Local jurisdictions will set collection rates.
- e) South County agencies should eventually (by 1990) change their reliance on bayside landfill because it is not environmentally sound; it wastes significant resources; and it conflicts with State, regional and local policies for resource recovery.
- f) It is not anticipated that Newark will lose revenue by loss of any franchise fee. The Advisory Committee has recommended that solid waste management administration be "funded by a fee based on collections."
- g) The South County will be paying for the proposed system in proportion to their use of that system; therefore, it will not be financing facilities for North County.
- h) It is possible to continue the South County's present solid waste system in the short term; however, operational standards and ordinances will have to be revised to meet State requirements. But the present system is in conflict with State policy and is not a long term solution to the solid waste problem.

- i) Any revenues from any publicly-owned transfer/processing/recovery facility will be applied to offset the costs of the facility to keep user charges as low as possible.

Very truly yours,



William H. Fraley
Planning Director

WHF:lc

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

1111 JACKSON STREET, ROOM 6040

OAKLAND 94607

Phone: Area Code 415

464-1255



October 3, 1975

File Ref: 2198.09(RJR)

Mr. William H. Fraley, Planning Director
Alameda County Planning Department
399 Elmhurst Street
Hayward, CA 94544

RECEIVED
OCT 6 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

Dear Mr. Fraley:

Alameda County Solid Waste Management
Plan and Draft Environmental Impact Report

I would like to commend members of the Plan Advisory Committee, and staff of the Alameda County Planning Department, for their effort to develop a recommended solid waste management policy plan, which maximizes the conservation of our natural resources.

Environmental impact of current disposal practices, and analyses of alternative plans, have generally been adequately addressed for this conceptual level of planning. Our comments here will, for the most part, reiterate findings of the report; and, we hope, focus attention on water quality problems associated with solid waste disposal.

We at the Regional Water Quality Control Board are particularly concerned with the management of existing disposal sites, both along the bay shore and in the Livermore - Amador Valley groundwater basin. The impact of each of these sites on water quality has been briefly summarized in the report, and it is indicated a more detailed analysis of each site is included in Appendix "A". It is hoped that mitigative measures to control bay water intrusion, percolation of leachate into groundwaters, and runoff from each site are discussed there. If not, we urge the development of these measures and that their implementation be given high priority in the early stages of detailed planning. We recommend a policy statement to this effect be included in the current report.

If the above suggestion is included, we believe the findings and policy statements in Chapter VIII, pertaining to water quality, are comprehensive and will provide a solid basis on which to develop a county plan. Policies for both landfill site selection and regulation of toxic waste disposal, as defined in the report, and summarized here are most important.

- A minimum number of disposal sites which will provide adequate capacity for county needs should be selected. Both Class I and II sites should be identified. All sites must be subjected to a critical review.

Mr. William H. Fraley

-2-

October 3, 1975

- Toxic wastes are being dumped into Class II sites, sewers, streams, and vacant lots. The regulation of land disposal operations by a single county enforcement agency is needed.

We believe these policy issues should be given high priority in the development of your county's Solid Waste Management Plan, and will be pleased to assist in that endeavor.

Sincerely,



GRIFFITH L. JOHNSTON
Chief of Planning

GLJ/daw

cc: State Solid Waste Management Board
1416 - 9th Street
Sacramento, CA 95814

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

October 3, 1975

Mr. William E. Carpenter, Chairman
County of Alameda Planning Commission
3546 Arcadian Drive
Castro Valley, California 94546

Dear Mr. Carpenter:

Three years ago the State Legislature enacted the State Solid Waste Management and Resource Recovery Act of 1972, which mandated State responsibility for development and maintenance of a State policy and guidelines. Additionally, the new State law directed each county to develop a county solid waste management plan.

The Preliminary Draft of the SOLID WASTE MANAGEMENT PLAN FOR ALAMEDA COUNTY dated August 1975 and a subsequent PRELIMINARY RECOMMENDATION OF THE SOLID WASTE MANAGEMENT PLAN ADVISORY COMMITTEE (SWMPAC) dated September 18, 1975 have been submitted to you for review, comment and recommendation.

The Oakland Scavenger Company has specific comments on both of these documents and wishes to make them known to you prior to your taking any action.

As you know, our company has provided collection and disposal service within the county for many years and has established and maintained an excellent reputation. The documents you are being asked to take action on as developed by the County Planning Staff and by SWMPAC could seriously effect our ability to continue to provide the level of service enjoyed in the past and our ability to provide a long term solution to the solid waste problem.

A critical concern specifically involves a statement in the Preliminary Recommendation of SWMPAC. Paragraph A.2.C. states "that no major long-term commitment, either to private or public enterprise, be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production and disposal."

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

This statement was introduced by a margin of 9 to 7 votes in the SWMPAC Preliminary Recommendation specifically to prevent a go ahead for the multimillion dollar transfer station/resource recovery and sanitary landfill program that is severely needed for 800,000 people in the East Bay.

As you are aware, financial commitments by our company thus far have exceeded \$1 million, and construction must begin within months if we are to keep up with waste removal in the East Bay. Major long term commitments are vital for our program to proceed.

The work of the Joint Refuse Rate Committee is nearing completion and a format for a model contract to allow financing for the program is being discussed. Thus, the time for continued and additional studies has passed and the time for action and commitments is here.

Another objectionable feature of the Preliminary Draft Plan is the creation of a new joint powers agency called the County Solid Waste Management Board. As outlined in Draft Report #22, prepared by County Staff, this new agency would consist of a large staff which could require an annual operating budget in excess of one-half million dollars. Some of the duties as envisioned by advocates of this Board would include contracting with collectors, financing major projects, administration and operation of facilities.

There is no present need for a new layer of government. If the future holds that an agency of some type is needed to finance a large scale energy recovery program of \$50 million or more then the exact size and function of such an agency could be more clearly defined at that time, not now.

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET • OAKLAND, CALIFORNIA 94607

Telephone 465-2911

The present Joint Refuse Rate Committee should continue to function in its present role, and if needed could expand that role to encompass the entire county. We feel the primary responsibility of waste removal and disposal should be retained at the local level through either public or private operations.

An additional aspect of the implementation involves the enforcement of regulations and ordinances on a uniform basis to public, private and Federal Government operations within the County.

It is widely recognized that coordination of enforcement agencies is fragmented within the county. However this is not to say that enforcement is lax.

The operation and maintenance of these sites is monitored and inspected by several government agencies including the Alameda County Health Dept., Regional Water Quality Control Board, Bay Area Air Pollution Control District, County Dept. of Public Works, City Public Works, County Water District and Corp of Engineers to name a few. Each Agency inspects a specific phase of the operation in which it has expertise. Each of these agencies has a statutory responsibility that cannot be delegated or consolidated in a single agency.

There is considerable merit in trying to coordinate the activities of these various regulatory agencies and an individual appointed by the Board of Supervisors and working within the Health Care Services Agency would provide the necessary services.

However, there is no need to create a Commission to oversee this coordinator.

OAKLAND SCAVENGER COMPANY

2601 PERALTA STREET

OAKLAND, CALIFORNIA 94607

Telephone 465-2911

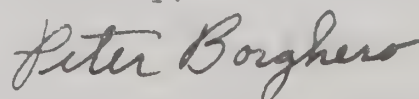
Therefore, we request that your honorable body modify the Preliminary Draft Plan to:

1. Provide that matters of rate setting franchise terms and services needs continue to be negotiated at the local level through the present Joint Refuse Rate Committee, or expanded if desired;
2. Remove the provisions for the formation of a new County Solid Waste Management agency from the plan until such time as the need for such an agency has been clearly demonstrated;
3. Provide for the appointment of a County Solid Waste Coordinator within existing county agencies to coordinate the activities of all agencies involved in enforcing solid waste operations in Alameda County and to provide technical assistance to cities that have segments of the solid waste system within their jurisdiction;
4. Remove the provisions for the creation of a Regulatory Commission; and
5. Eliminate any language in the plan which will prohibit or delay Oakland Scavenger Company from proceeding immediately with its long range plans in accordance with standard permit procedures.

We do want to emphasize that our long range program, which we announced a year ago, is in conformance with the County Solid Waste Management Plan except those specific aspects noted above. We feel that we can develop the physical facilities to implement a model solid waste disposal system using private capital with the long term support of our franchisees.

We will be pleased to meet with you or your staff at your convenience to discuss our recommendations and our program for serving the residents of the county. We request that you inform us of any public hearing on the County Solid Waste Management Plan so that we may participate.

Sincerely,



Peter Borghero, President

ALAMEDA COUNTY PLANNING DEPARTMENT

399 Elmhurst Street, Hayward, California 94544

ph 783:5800

October 27, 1975

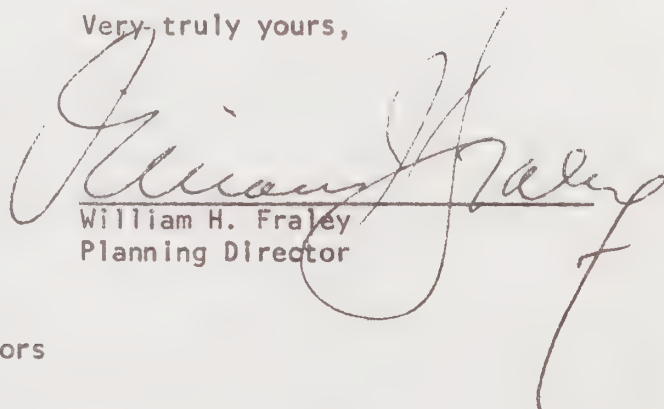
Chairman and Members
Alameda County Planning Commission
399 Elmhurst Street
Hayward, California 94544

Dear Mr. Carpenter:

A letter critical of the Alameda County Solid Waste Management Plan signed by Peter Borghero, President of Oakland Scavenger Company has been sent to your Commission and to many of the cities and agencies and commissions in the County. Since there are a number of misinterpretations of the proposed plan in the letter, I feel that, in behalf of the Solid Waste Management Plan Advisory Committee, Technical Advisory Committee, and staff, that responses to some of the statements are in order.

The enclosed report, "Response to Oakland Scavenger Company Letter to the Alameda County Cities, October, 1975," prepared by Alameda County Planning Department attempts to clarify some of the misinterpretations.

Very truly yours,



William H. Fraley
Planning Director

WHF:lc

cc: Alameda County Board of Supervisors
Mayors of Alameda County Cities
Airport Land Use Commission
Alameda County Parks Advisory Commission
Oakland Scavenger Company
Solid Waste Management Advisory Committee
Solid Waste Management Technical Advisory Committee

RESPONSE TO OAKLAND SCAVENGER COMPANY LETTER TO THE
ALAMEDA COUNTY CITIES, OCTOBER, 1975

The following report includes statements in the Oakland Scavenger letter, followed by a staff response:

Oakland Scavenger Company:

- As you know, our company has provided collection and disposal service within the County* for many years and has established and maintained an excellent reputation. The documents you are being asked to take action on as developed by the County Planning Staff and by SWMPAC could seriously effect our ability to continue to provide the level of service you have enjoyed in the past and our ability to provide a long term solution to the solid waste problem. *(City letters state "within your city.")

Staff Response:

The Solid Waste Plan is a policy plan. In regard to disposal service, the Plan makes no specific reference to facilities other than identifying the need for a transfer station and processing facility (including energy recovery) in western Alameda County by 1980. While there is a recognized need for these facilities including landfill in the near future, existing landfill capacity will last 6 or 7 more years (Vasco Road and Durham Road sites only.) Oakland Scavenger Company owns and operates the Durham Road site and Vasco Road is owned by William Ralph. Vasco Road has potential for expansion. The remaining capacity at existing landfills assures continuation of the present level of service as well as time to plan and implement material and energy conserving programs. There is nothing in the Plan that is aimed at preventing private industry from providing collection services and developing facilities consistent with Plan policies and all other environmental laws.

Oakland Scavenger Company:

- A critical concern specifically involves a statement in the Preliminary Recommendation of SWMPAC. Paragraph A.2.C. states "that no major long-term commitment, either to private or public enterprise, be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production, and disposal."
- This statement was introduced by a margin of 9 to 7 votes in the SWMPAC Preliminary Recommendation specifically to prevent a go ahead for the multimillion dollar transfer station/resource recovery and sanitary landfill program that is severely needed for 800,000 people in the East Bay.
- The term "major" was added to the statement by Berkeley representatives on the committee because they feel their project, the Bay Delta Program, is not a "major" commitment, and could be built anyway.
- As you are aware, financial commitments by our company thus far have exceeded \$1 million, and construction must begin within months if we are to keep up with waste removal in the East Bay. Major long term commitments are vital for our program to proceed.

Staff Response:

A substitute motion to remove the "no major long-term commitment" clause from the preamble of the SWMPAC's preliminary recommendation failed by a margin of 7 to 9 votes. The preliminary recommendation passed by a vote of 10 to 6. It is inaccurate for Oakland Scavenger Company to attribute this change to the Berkeley representative. At the September 18, 1975 meeting of SWMPAC the Berkeley representative neither mentioned the Bay Delta Project nor referred to this project as a

major commitment. The concern expressed by Berkeley was related to their transfer station, which is in design phase. It was also understood that "major" implied Countywide and affecting a substantial population. A majority of the members wished to avoid the 25-year commitment suggested in the Draft Model Agreement being worked on by the Joint Refuse Rate Committee.

In this manner the questions regarding private ownership/operation and location and public ownership/operation could be adequately evaluated. There appear to be some benefits to public ownership/operation of landfill sites, particularly since any pollution problems are public problems. Financing large capital investments also may benefit from public financing through finance cost savings.

Oakland Scavenger Company:

The work of the Joint Refuse Rate Committee is nearing completion and a format for a model contract to allow financing for the program is being discussed. Thus, the time for continued and additional studies has passed and the time for action and commitments is here.

Staff Response:

The membership of the Joint Refuse Rate Committee after the Price-Waterhouse Study of 1972 includes city staff from cities holding franchises with Oakland Scavenger Company and representatives from Oakland Scavenger Company. Coordination of this group with the Solid Waste Management Plan Advisory Committee has been minimal. Oakland Scavenger Company, one of the largest scavenger companies in the United States, has been assisting in discussions for implementation of the Price-Waterhouse recommendations for nearly four years. Implementation of those recommendations would enable city (and special district) staff to know what the costs of the service is (accounting) and to insure the company a decent return on investment without burden to the taxpayer. There is nothing unreasonable about this process and it should be opened up and performed on a countywide basis for public and private systems alike (accountability).

Oakland Scavenger Company:

Another objectionable feature of the Preliminary Draft Plan is the creation of a new joint powers agency called the County Solid Waste Management Board. As outlined in Draft Report #22, prepared by County Staff, this new agency would consist of a large staff which could require an annual operating budget in excess of one-half million dollars. The expense of this new agency would be offset by existing franchise fees from your city. Some of the duties as envisioned by advocates of this Board would include contracting with collectors, financing major projects, administration and operation of facilities.

Staff Response:

This is an opinion of Oakland Scavenger Company and is not found in the Plan or any of the background reports. At the request of the SWMPAC in October 1975, staff has prepared budget estimates for Plan Implementation and if costs were between \$150,000 to \$300,000 per year as staff estimates, for this program, it would mean from less than \$.50 to approximately \$.75 per household per year. In terms of property Tax Rate, it would mean from less than $\frac{1}{2}$ cent (\$.005) to less than $\frac{3}{4}$ cent (\$.007) per \$100 of valuation.

The contention that the "need for a new layer of government" is an erroneous misconception. It is clearly spelled out in the law that plan administration includ-

ing policy making, public information, budgeting, planning adoption and enforcement of ordinances and standards, and management and operation of the system (California Administrative Code 617177b) must be assigned functions and part of the Plan. The option presented for consideration is assignment to a joint powers board as suggested by the SWMPAC with the enforcement role assigned to the County Health Department. The State mandate is quite clear and it is to everyone's advantage to do the job correctly the first time.

The draft plan does not recommend a new layer of government (new special district, public authority) at this time. It does recommend a new agency to coordinate solid waste planning at the countywide level, but the agency would rely on existing agencies to continue their present functions. (Refer to pp. 1-7, 8 in the Draft Plan.) Because of the existing fragmentation of public authority and responsibility for the provision of an essential public service, an agency with comprehensive authority for planning and implementation is necessary in order for the existing solid waste system to be improved consistent with State Policy and Regulations.

Oakland Scavenger Company:

- The present Joint Refuse Rate Committee should continue to function in its present role, and if needed could expand that role to encompass the entire county. We feel the primary responsibility of waste removal and disposal should be retained at the local level through either public or private operations.

Staff Response:

It would be difficult if not impossible to expand the present Joint Refuse Rate Committee to encompass the entire county according to the existing agreement. This joint powers agreement by ten of Oakland Scavenger Company's 12 franchises limits the Committee's functions to determining rate setting/service matters and a model contract. It is not an adequate alternative because it would omit the Cities of Berkeley, San Leandro, Alameda, and Pleasanton who do not contract with Oakland Scavenger Company. It is questionable, also, whether all the required mandatory activities previously mentioned could be handled by this Committee for many reasons.

Oakland Scavenger Company:

- An additional aspect of the implementation involves the enforcement of regulations and ordinances on a uniform basis to public, private and Federal Government operations within the County.
- It is widely recognized that coordination of enforcement agencies is fragmented within the county. However, this is not to say that enforcement is lax.
- The operation and maintenance of these sites is monitored and inspected by several government agencies including the Alameda County Health Department, Regional Water Quality Control Board, Bay Area Air Pollution Control District, County Department of Public Works, City Public Works, County Water District and Corp of Engineers to name a few. Each Agency inspects a specific phase of the operation in which it has expertise. Each of these agencies has a statutory responsibility that cannot be delegated or consolidated in a single agency.
- There is considerable merit in trying to coordinate the activities of these various regulatory agencies and an individual appointed by the Board of Supervisors and working within the Health Care Services Agency would provide the necessary services.

However, there is no need to create a Commission to oversee this coordinator.

Staff Response:

The Plan does not call for the delegation or consolidation of the various Federal, State, and regional agencies' statutory responsibilities. Rather, overall authority for monitoring and enforcement should rest with a local agency to insure that the regulations and concerns of other regulator agencies are actually enforced. Staff shortages have occasionally resulted in a lower level of enforcement, creating problems at landfill sites. Regulatory responsibility is fragmented and some overall coordination is needed if the public interest is to be served.

With respect to Oakland Scavenger Company's assertion that "There is no need to create a Commission to oversee this (regulatory) coordinator," the company's representative voted in favor of the following motion at the September 11, 1975 Solid Waste Management Plan Advisory Committee meeting:

"Move that the concept of regulation under County surveillance with a solid waste regulatory commission and regulatory coordinator (emphasis added) be separate from a Joint Powers Management Board, to be responsible for policy operations, planning, and implementation."

Members of the Advisory Committee felt that an enforcement commission was necessary in order to review existing ordinances, propose new regulations where needed, and act as a hearing board.

Thus, the Company proposes that a County Solid Waste Coordinator be appointed to take the place of a joint powers agency and enforcement commission and that this coordinator be assigned the duties of coordinating enforcement activities and to provide technical assistance. Their recommendation does not provide for functions of plan implementation required by SB-5, which are mentioned above.

Oakland Scavenger Company Makes Five (5) Recommendations:

- 1) Provide that matters of rate setting, franchise terms and services needs continue to be negotiated at the local level through the present Joint Refuse Rate Committee, or expanded if desired.

Staff Response:

This recommendation is inconsistent with the State Law, and the Draft Solid Waste Plan. It is also limited to a portion of the county and to two issues--rate setting and model contract.

Oakland Scavenger Company:

- 2) Remove the provisions for the formation of a new County Solid Waste Management agency from the plan until such time as the need for such an agency has been clearly demonstrated.

Staff Response:

The efficiency of a countywide Joint Powers Agreement has been discussed and is suggested primarily to achieve coordinated system regulation and development. The legal requirement to designate the various roles for plan administration have also been discussed. Since this concept is central to the countywide Plan and the need clearly exists, this recommendation only serves to obfuscate and serves no useful purpose.

Oakland Scavenger Company:

- 3) .Provide for the appointment of a County Solid Waste Coordinator within existing county agencies to coordinate the activities of all agencies involved in enforcing solid waste operations in Alameda County and to provide technical assistance to cities that have segments of the solid waste system within their jurisdiction.

Staff Response:

The need for the coordinator and/or administrator as suggested by the SWMPAC has not been disputed. The cities will be addressing this question during thier review of the Plan.

Oakland Scavenger Company:

- 4) .Remove the provisions for the creation of a Regulatory Commission.

Staff Response:

The concept of a regulatory commission was added to the recommendations in the published report by the Solid Waste Management Plan Advisory Committee. This commission would handle all enforcement problems including revision of local ordinances. There are several alternatives for assigning these responsibilities: a) leave as is, b) include as part of joint powers agency function, or c) assign to County Health Care Services Agency.

Oakland Scavenger Company:

- 5) .Eliminate any language in the plan which will prohibit or delay Oakland Scavenger Company from proceeding immediately with its long range plans in accordance with standard permit procedures.

Staff Response:

No language in the Plan has or will delay Oakland Scavenger Company in presenting its proposals and requesting permits. Yet as with other essential public services such as fire and police protection, the public must be guaranteed that the right decisions are made for modernizing the solid waste system consistent with the plan that is found to be best for the citizens of Alameda County.

STATEMENT BEFORE CITY COUNCIL, OCTOBER 6, 1975

RE COUNTY SOLID WASTE MANAGEMENT PLAN

The San Leandro League of Women Voters commends the Solid Waste Management Committee for its informative, comprehensive, and well-documented study. Recommendations appear to be well reasoned. The League also commends the Planning Commission and staff as well as the Board of Supervisors for the manner in which the plan for solid waste management was developed - the chosen committee represented a good cross-section of viewpoints.

The Preliminary Draft, August 1975, however, is a challenge even to those citizens interested in solid waste. The reader is unsure at times what material is included for background information and what is actually proposed as policy for Alameda County. The document is not organized for convenient study.

There are several recommendations in the draft which the league strongly supports. The league has long urged that solid waste disposal planning be done on the regional level and thus concurs with the committee's recommendation to work toward such regional planning of solid waste management.

The league also supports the committee's recommendation to explore presently developing alternatives for handling, disposing, and recovery of resources and energy from the solid waste stream but wish the committee had addressed the problem of source reduction in a more forceful manner. Source reduction is a major priority with league because members are concerned by the waste of materials and by the depletion of non-renewable resources. The LPA is aiming for 80% use of refillable bottles for beverages, longer lived tires, and a 10-25% reduction in packaging materials which would reduce

overall waste volume by 15-20%. Separation of glass, aluminum, newspaper, and cardboard before collection would enable an additional 15-20% reduction in waste disposal, according to the LPA. We hope that Alameda County will study the feasibility of a county bottle bill and take an active role in initiating state and federal legislation aimed at source reduction.

The League of Women Voters along with the Association of Bay Area Governments has supported the Bay Delta Resource Recovery Project as a possible method of saving valuable farmland from eventual inundation. However, because of a lack of continued federal funding, the project is floundering. We support further study to evaluate the feasibility of such a project.

The League commends the committee for recommending that no long-term commitment, either to private or public enterprise be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production, and disposal. We hope, however, that factors such as environmental quality and land use will also be emphasized.

We recognize the fact that the Committee does not recommend a site for collection or disposal of solid waste, but Oakland Scavenger Company has well publicized its plan for a transfer station at the foot of Davis Street. The League of Women Voters of San Leandro supports adherence to the General Plan which has always designated this area as Open Space. This open space designation has been based on the fact that the Bay front location of the area was appropriate for open recreational uses. We hope that the County Planning Commission and Board of Supervisors as well as the San Leandro City Council will keep this in mind during any discussion of the Solid Waste Management Plan.

We realize that there are complex issues of administration and operation to be determined by waste management ordinance. We hope that the San Leandro City Council and staff will take an active role in the decision making to insure that San Leandro citizens receive adequate consideration as to air quality, transportation, recreation, and cost factors. . . .

Mulford Gardens Improvement Association has studied the Solid Waste Management Plan as submitted by the County Advisory Committee, and discussed the alternatives. We have attended numerous meetings in the past months, including meetings of the Advisory Committee for the past several months. We would like to commend the committee for the sincerity, dedication and seriousness with which they worked on this plan. We would like to point out--and feel it is somewhat significant--that San Leandro was not represented on the citizens' advisory committee. When Supervisor Santana took office in January, he appointed a San Leandro person to fill a vacancy, but that appointee attended only one meeting.

There are several points about the plan that we would like to discuss.

First and foremost, we are extremely concerned about the site to be selected for the collection point. A central transfer station seems to be a vital part of any of the alternatives. The committee studied methods of disposal, cost structure, types of solid waste, resource and materials recovery, administration -- but it did NOT recommend a site. The plan states only that it "should be in a central location." The EIR, in Chapter IX-1, specifically states, "It is not a project plan which identifies specific new sites for solid waste processing, resource recovery, and/or disposal."

HOWEVER, throughout the report, reference and inference is made to the Davis St. site, and Oakland Scavenger's proposal. In Chapter II-45 it states, "One transfer station is approved in Pleasanton; another proposed in Berkeley and OSC has mentioned opening several to serve their collection system throughout the county." Even so, the underlying understanding throughout is THE site at Davis St. All the land fill sites in the county are described in Chapter II. At some of the sites, mention is made of the zoning, or planned eventual use. Regarding Davis Street, paragraph 51, it says, "Owner has talked about establishment of a transfer station and processing facility on this site." No mention whatsoever is made of San Leandro's General Plan, nor zoning, as it does for the San Leandro Marina dump and West Winton dump, for instance. The site on Davis St., as proposed by OSC, is in direct conflict with San Leandro's General Plan, and is in direct conflict with the County

Open Space Element, which was approved by consent by the City of San Leandro.

State law, SB-7, says that any plan must recover 25% of the solid waste stream to be acceptable to the State Solid Waste Management Board. The plan for material recovery, Plan 1980-B and 1990-B, (OSC's plan) would recover only 7%. So that plan, by itself, would not be acceptable. It MUST be used in connection with another, such as Bay Delta, or energy recovery, (Plan 1980-C and 1990-C, which the committee has recommended. That means we are talking about a "package unit" plan and/or site in order to meet state requirements.

In Chapter V, where alternative systems are discussed, the paragraphs about energy recovery by P.G.&E. or EBMUD, under the Purox system, says it "takes in directly the output of materials recovery system, (such as OSC)." In connection with this, the EBERRS report, in discussing sites and cost, pertaining to Davis St. vs. Yerba Buena (and no other site is mentioned), Chapter VI-19, par. 11 states . . . "The Davis Street site is preferred because of a lower cost product. It is the planned location of OSC's new refuse processing plant, and to keep the two plants in close proximity, the land for the syngas plant has been offered at no cost . . ." (picture of plant)

San Leandro "inherited the dump". It was a dump in the County, and when the land was annexed to San Leandro at the same time Mulford Gardens and other shoreline property was annexed, the dumping continued. Immediately, long range plans for eventual recreational use were put into effect in maps and studies. OSC has dumped in that location for over 30 years, with full profit-producing benefits, - (and with no special benefits to the City of San Leandro, as is being done in Mountain View.) *San Leandro pays Mt. View approx \$1M - a year - 8 years - park* OSC has had full understanding of eventual park/recreation/open space use. There is no logical reason why a transfer station must be in that location. The question arises, where should a transfer station be located. This may be a task for the advisory committee. Several suggestions have been made. One possible consideration is mentioned briefly in the plan, stating "disposal operations could be leased to a private operator, while land is in public ownership." This might also apply to a transfer station. After all, this IS a regional, and a public problem. At any rate, we DO object to the apparent acceptance in the report and in committee

conversations of the Davis Street site.

In the Summary, Chapter I-8, par.4 . . "the location of these transfer stations and the central processing facility should be carefully examined for efficiency and cost effectiveness." MGIA firmly believes that other factors MUST be considered. We believe the words "social impact and land use" (or similar) should be included.

Mulford Gardens Improvement Association strongly urges the City Council, when making their recommendations to the County on this plan, to include in their statement that the land proposed by OSC at Davis Street is planned for recreational use on San Leandro's General Plan, and that the company has not as yet applied for a change in the General Plan, nor for the necessary rezoning. This would eliminate any future misunderstanding.

Secondly, we commend the committee for its thorough study of reducing the waste stream, and greater material recovery. However, we feel the issue should be pursued more aggressively and positively, as this is a necessary part of solid waste management. In numerous places throughout the plan, source reduction is discussed, and methods of achieving it through container bill legislation, neighborhood recycling centers and others. We applaud the committee for recommending policies and legislation needed regarding federal and state laws. Still, we feel much of the reduction could and should be handled on a local level (county or regional), rather than such terms as "federal legislation should", and "state requirements should be", etc.

Separation at the source could be a very positive and complete method of materials recovery, with a much higher percentage of recovery than could be accomplished in a central location. It can be done, and it does work! At the present time, the only technically and economically feasible material recovery is ferrous metals. Glass and non-ferrous metals, such as aluminum, copper, etc., are shredded with the rest of the garbage and hauled to the landfill site. There could be neighborhood collection points. Or - we believe a better solution might be for a collection company to pick up the separated glass, cans, etc. It seems that less gasoline would be used, and certainly more total recovery is probable, if a

collection truck pick up every-other week, maybe on a month, than if each householder took his own recyclables to a central point.

Retail outlet recovery is a very workable plan, too. It worked during WWII, when you had to turn in a toothpaste tube to buy toothpaste, take your ^{own} paper sacks to the store, etc. That worked because it was a national emergency; we feel we have a national emergency now regarding our non-renewal resources.

Another way to reduce the amount of garbage collected is to not make it so attractive to have larger quantities of garbage picked up. With one exception (Albany) all the charges in the county are less for the second can of garbage than for the first. It should be ~~the~~ the other way around, to discourage filling the garbage can. Commercial and industrial users pay a lesser amount for volume. The entire system makes it easy to dispose of more garbage.

These possibilities are all discussed in the plan. It is noted, however, that the estimates on tonnage, costs, etc. are based on an increasing amount of garbage generated per person arriving at the disposal site. The chart shows that in 1973, 5 lbs. of garbage per capita per day was generated (excluding demolition wastes.) In 1975, the figure is 5.1 lbs./cap./day. In 1980, it is 5.36 lbs./cap./day. In 1990, it has increased to 5.92 lbs./cap./day. It seems that using those figures in planning does not indicate a sincere approach to waste reduction.

We feel, therefore, that some points should ^{be} a very specific part of the plan, such as (1) use of non-disposable materials; (2) provide collection of recyclables at the source, (3) making secondary materials competitive with virgin materials, by encouraging availability of markets, reduction of freight rates, etc. However, we do not feel that subsidizing companies for using those materials is the answer.

MGIA believes that the Bay Delta Alternative should be given more consideration. We feel that saving the valuable and irreplaceable farm land of the Delta might well be far more important than the expensive energy recovery system. The plan mentions federal funding for research, development and demonstration programs. The Bay Delta project should qualify for that study. On page 5 of the summary, we feel that the 41% resource recovery attributed to the Bay Delta project in 1990 must be

far too low a figure, inasmuch as land composting is considered resource recovery, and the Bay Delta meets that criteria. The minutes of the SWMPCAO meeting of August 28 state that the motion was made "that they continue watching the Bay Delta project, and if it does prove feasible, they strongly urge the Solid Waste Group should consider it at that time." The motion carried unanimously. This demonstrates the committee's interest in that alternative. This plan is to be reviewed every three years. It would seem that any major changes in solid waste disposal plans would be impractical or impossible, after initial implementation. Reviews and evaluations most likely could include only administration, operation structure and other items. If the feasibility of the Bay Delta project is to proceed, now is the time to recommend it.

We are uncertain about the significance of some of the cost tables in the Summary. For example, how is the revenue from recovered materials handled? The tables and text don't indicate that it reduces the costs. It should. Who owns the garbage? If ordinances mandate garbage pickup, then it would seem that any proceeds realized from the sale of recovered materials should be returned to the customer in reduced rates. The same should be true of energy recovery. The report says that it costs more than is recovered, but that the advantage is in reduced land fill. In another section it says that enough methane can be generated to serve 10,000 to 15,000 homes. At the mentioned \$5 per ton for fuel (garbage), there must be a profit, unless the multi-million construction cost is considered as operational cost. But the report further emphasizes that capital cost is prohibitive to private industry, and should be handled by public funds or subsidies. In other words, we believe that the cost figures in the Summary are inadequate for true comparison of costs of the various plans.

MOIA did not evaluate the actual administration of the plan, regarding a new or established regulatory agency and other features. However, we do believe that the jurisdiction (city or county) in which a transfer station and/or processing facility is located should have major input and authority. To emphasize our reason for this position, we would call your attention to the unsightly situation at the

present dump site, regarding litter, storage of paper, and other aspects of the operation. In addition, the litter-strewn streets, roads and freeway exits en route to the dump site point out the need for local supervision and authority. A "little" city, such as San Leandro, might well be overruled, as 51% of the population agrees on a plan and implementation.

We are aware that many of the specifics for implementation will be covered in an ordinance yet to be written. But we feel that some of the details should be discussed at this time before final approval is given. Public hearings are mentioned, but it's not clear if that will be done by the county only, or if cities are to hold hearings. The collection rate structure will probably be decided in that ordinance. As we study the current rate structure, we note that it is not uniform, and some of the most distant cities that dispose of garbage at Davis St., San Leandro, have the cheapest rates. For instance, Albany dumps at Davis St., a distance of 18 miles, and the charge is \$1.90 per month. Piedmont residents pay \$1.90 (\$2.20 for 2 cans), and their garbage travels 12 miles to San Leandro. Oakland pays \$2.40 for an 8 mile trip. In San Leandro, where we dump in our own back yard, we pay \$2.40 per month. The City of San Leandro pays \$3.25 per ton for disposal. We feel that a more equitable rate structure should be implemented. Furthermore, we feel that the city in which a transfer station is located should receive some benefits besides cheaper garbage collection, such as a surcharge or a franchise fee for garbage hauled in from another city.

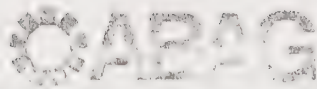
MGIA questions the advisability of ONE central transfer station. Orange County has 3 transfer stations, to handle 1700 tons of waste daily. The City of Seattle has 2 large stations; King Co., Washington has 7 smaller stations. Other areas provide for more stations, with less garbage to each. Oakland Scavenger plans for eventual 2000 tons daily at one location. We further question the necessity of locating an energy recovery plant at the transfer station site. It would appear that since the pyrolysis plant produces considerable slag, it might better be located at the landfill site.

This plan discussed only three basic alternatives: a material recovery system; a material/energy recovery system; and the Bay Delta project which also includes energy recovery. It is not clear whether or not other possibilities have been discussed by the committee in their planning. Neither do we know whether or not it is a possible subject for discussion by the cities at this time. Very briefly, then, we would like to suggest that we feel that the practical solution of a solid waste problem as submitted by Homer Hamlin in 1967, warrants further study. A modified version of that plan, in which he recommended several small transfer stations (approximately 12) throughout west and east Bay, and a unit train for hauling to a landfill site, seems to have many advantages in a complete regional plan.

MGIA asks that no final approval be given by you, the City Council, until these and other pertinent points have been more fully clarified to you and to the public.

Thank you.

*(Presented to San Leandro City Council, October 6, 1975,
and submitted to Alameda County Planning Department
at the City Council meeting.)*



Association of Bay Area Governments

Hotel Claremont • Berkeley, California 94705 • (415) 841-9730

October 9, 1975

Miss Betty Croly
Assistant Planning Director
County of Alameda
399 Elmhurst Street
Hayward, California 94544

RECEIVED
OCT 14 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

Dear Betty:

The staff review of Alameda County's preliminary Solid Waste Management Plan, for issues of regional significance, has been completed. An outline of comments on the Plan was presented to the Regional Planning Committee on October 1, and was approved after discussion (copy attached). We find that the Plan presents a strong framework of policies for guiding future specific decisions in Alameda County on source reduction, recycling and resource recovery programs and systems, and on the necessary institutional arrangements for plan implementation. We suggest, however, that the details of the composition of the Policy Board of a Joint Powers Agency, be decided by the signatories to the Agreement.

Our comments primarily address the section on Regional Coordination on page I-9 of the Summary of Recommended Policies. In the text, and in the findings contained in the Plan report, there are statements of intent regarding regional coordination. We believe that the policy statement regarding regional coordination, and the Plan itself, would be strengthened by more explicit identification of continuing cooperative studies and actions at the regional level, e.g.:

1) Support action at the State and intercounty level to require standardized data collection and accurate measurement of wastes disposed, to establish a common data base to benefit county and regional planning.

Refer to text:

Page VIII-7. Findings #4. Need for improved record keeping and regular weighing of incoming loads.

VIII-11. Legislation/Policies Needed. #3. State provision for standardization of data gathering, recording and reporting.

Page IX-6. Paragraph 6. Adequate, updated data base lacking.

2) Consider intercounty agreements on the location and financing and/or operation of transfer stations or resource recovery facilities.

Refer to text:

Page IX-3.D. Regional Coordination. The paragraph discusses communications with Contra Costa and Santa Clara Counties. Although these investigations have been of a research or feasibility study nature and very preliminary, the recommended policy #4 on page I-8, should include a criterion for the location of future transfer stations in northern and southeastern Alameda County specifying coordination, as appropriate, with Contra Costa County, and in southern Alameda County with Santa Clara County. Policies relating to financing and/or operations of such future facilities should include consideration of intercounty arrangements.

3) Participate in the EPA funded regional wastewater treatment residuals management study to be conducted by major dischargers, with EBMUD as lead agency.

Refer to text:

Page I-9. Regional Coordination.

Page II-25,27. Wastewater Treatment Residues.

Page VIII-7. Sewage Treatment Residues.

Page VIII-22, 29. Regional Coordination.

4) Cooperate in forming a regional secondary materials clearinghouse as a step toward establishment of stable markets for materials recovered by counties.

Refer to text:

Page I-9. Regional Coordination.

Page VIII-14. Findings #3,9. Fluctuations of secondary materials markets.

Page VIII-22,29. Regional Coordination.

*

*

*

An additional example of Alameda County's past and continuing commitment to coordination, not fully documented in the report, is more than two years of active participation with other counties in ABAG's coordination program. The Alameda County Planning Department was instrumental in the initiation of this program in August of 1973, and more recently set the example for the other counties in identifying the availability of Class I sites as a regional issue, and requesting coordination of technical assistance from State Agencies through ABAG. The Environmental Constraints Map of Alameda County, prepared for the Plan, provides a model for the regional study. At Alameda County Planning Department's invitation, an ABAG staff member has participated on the Technical Advisory Committee since July 1973.

Other Comments

1. On page VII-3, the discussion of ABAG under Regional Policies and Plans, should include authorizations under U.S. Office of Management and Budget Circular A-95 for review and comment, for consistency with Regional Planning, on local applications for assistance under more than 100 Federal Programs (including solid waste management sites and facilities), and draft environmental documents for proposed projects of regional significance; and under the State Solid Waste Management and Resource Re-

covery Act of 1972, for review and comment on County Solid Waste Management Plans for adequacy of coordination and consistency with appropriate regional and sub-regional planning.

2. Finally, regarding the Bay Delta Resource Recovery Demonstration: Alameda County, the Cities of Albany, Berkeley, Hayward, Livermore, Oakland, Piedmont, Pleasanton and San Leandro, and EBMUD have contributed cash and participated actively in designing a pilot-scale demonstration project, preparing a financial plan and a recommended intergovernmental implementation structure to investigate an alternative regional solid waste disposal system in the form of composting (page VIII-22, Finding #3). Because outstanding environmental and engineering safety questions have not been answered, this process cannot be considered a viable alternative at this time, even though two proposed alternatives in the Plan, 1980-A and 1990-A, include the Bay Delta System. Two possible fatal flaws in the Bay Delta concept--whether any material can be placed against the Delta levees without causing structural failure, and whether the quantities of organic wastes from a full-scale Bay Area system would be sufficient to save the levees--can be tested in field and laboratory investigations outlined for the first phase of the demonstration project. Various parts of the Phase I tests could be carried out under related studies in the Bay Area, principally the State Solid Waste Management Board's Bay Area Study using funds originally appropriated for the Bay Delta Demonstration. Given the cost implications of still unproven energy recovery technology as well as the strong interest in the Bay Delta proposal evidenced by local governments in Alameda County, we believe it would be appropriate for the Alameda County Plan to contain a strong recommendation to the State Solid Waste Management Board that it assist all Bay Area counties in the evaluation of alternatives by the earliest possible implementation of the definitive tests of the viability of the Bay Delta proposal.

The material and illustrations on the Bay Delta project on pages V-27 and 28 should be updated. Recent and more accurate information is attached.

Please let me know if you have questions concerning these comments.

Sincerely,

Yvonne San Jule
Senior Regional Planner

cc: Albert A. Marino

DATE: October 1, 1975

TO: Regional Planning Committee

FROM: John McKoy, Director of Planning and Programming
Yvonne San Jule, Senior Regional Planner

RE: OUTLINE OF COMMENTS ON ALAMEDA COUNTY PRELIMINARY
SOLID WASTE MANAGEMENT PLAN

The Alameda County plan is a policies plan. It contains recommended policies regarding the functions and components of a comprehensive coordinated solid waste management system and an implementation program for the short and long terms.

Recommended policies related to regional coordination call for a continuing strong role by Alameda County in the coordination program initiated by ABAG to discuss and study common problem areas such as land fill capacity, hazardous wastes and Class I disposal sites, import and export questions, resource recovery potential and source reduction.

Our comments will suggest that the plan will be strengthened by the addition of the following activities which are discussed in the body of the plan report but do not appear in the recommended policy statement:

1. Support action at the State and intercounty level to require standardized data collection and accurate measurement of wastes disposed, to establish a common data base to benefit County and regional planning.
2. Consider intercounty agreements on the location and financing and/or operation of transfer stations or resource recovery facilities.
3. Participate in wastewater treatment residuals management study.
4. Cooperate in forming a regional secondary materials clearinghouse as a step towards establishment of stable markets for materials recovered by counties.

Of particular interest in the plan document is an Environmental Constraints Map of Alameda County to be used to determine if there are any general areas in Alameda County suitable for Class I disposal sites. It could serve as a model for the regional study of Class I disposal sites to be carried out by State agencies (Department of Health, Solid Waste Management Board and Water Resources Control Board) and coordinated through ABAG.

THE BAY DELTA RESOURCE RECOVERY DEMONSTRATION

A TWO-PHASED PROJECT

The Bay Delta Resource Recovery Demonstration proposes to compost about 300 tons per day of domestic organic wastes (refuse and sewage sludge) from San Francisco and Berkeley with dredge spoil from San Francisco Bay, ship it by barge to Mandeville Island in the Sacramento-San Joaquin levee and place it in a 500-foot wide wedge behind existing levees. The Demonstration would be carried on over a three-year period and would include an intensive program of monitoring for air and water quality, agricultural worth and structural stability. A successful demonstration of the use of compost and spoil as a levee reinforcement and land restoration material could pave the way for a regionwide system that would accommodate municipal, and ultimately agricultural, wastes for at least one hundred years.

The estimated total cost of the Demonstration for a three-year period is about \$6.9 million. The proposed financial plan and cost allocation schedule call for a 50% Federal contribution -- of \$3.5 million -- with the balance to be shared between the State and local governments.

The State of California has appropriated \$2.3 million for the State share. Local participation will consist of \$1.1 million in new contributions, augmented by at least an equal amount in new construction, land-leases and in-kind services. The \$1.1 million in new contributions will come from the counties of the Bay and Delta areas in fulfillment of requirements of State legislation. The additional amount has been subscribed by the local agencies participating directly in the project.

Phase I, which is described below, has a developed budget calling for \$500,000 in cash and in-kind contributions from State and Federal sources, in addition to approximately \$120,000 from local agencies. The local share includes cash and in-kind services by the Bay Delta Resource Recovery Board and commitments by the Cities of San Francisco and Berkeley and the East Bay Municipal Utility District, for delivery of shredded refuse and sewage sludge, and lease of land for the composting operation.

Following the overall cost-sharing formula, a \$300,000 Federal contribution will be required to match \$200,000 from the State appropriation. The State Department of Finance has conditioned the release of any amount from the budget appropriation upon the commitment of corresponding Federal funds or services.

THE PROPOSED PHASE I PROJECT

Phase I of the Bay Delta Project was developed in April 1974. It is a one-year, self-contained unit, designed to answer a number of technical, environmental and economic questions that should be answered before commitment of the estimated \$6.9 million to operate the Demonstration is made.

Two testing programs are proposed:

A. Composting in the San Francisco Bay Area

1. Produce 2,500-plus cubic yards of compost by windrow composting, using shredded organic refuse and sewage sludge.
2. Construct a 3,100 cubic yard truncated pyramid embankment of compost and dredge spoil, the pyramid to be divided into four sections with an access well in the center. Each quadrant will contain a different mixture of compost and dredge spoil.
3. During construction and operation of the compost pyramid, perform these studies:
 - (a) Composting parameters
 - (b) Percolation rates
 - (c) Leachate production and content
 - (d) Amounts of heavy metals in compost
 - (e) Soil gas production
 - (f) Compaction
 - (g) Disease vectors and pathogens present
 - (h) Air pollution potential, particularly the amounts of airborne particles and odors.

The compost operation will further test the assumption that processing for topsoil building can be carried out in an urban area without environmental offense; that air quality in the region will not be threatened by pollutants, nor amenity in nearby residential areas suffer from odors.

B. Soil Testing in the San Joaquin Delta

1. Conduct field and laboratory tests of the existing peat soil and existing berms on Mandeville Island to determine strength, stability and consolidation parameters. This study will include the formation and repair of cracks in the existing levee, and rates of

placement of the berm fills. Piezometric levels will be measured in the berms, and the density, water content, permeability and settlement characteristics determined.

Questions to be answered:

- (a) Can an effective program of crack surveillance and repair be developed so that the berm can be built safely?
- (b) Can procedures be developed so that construction can continue in the wet winter months?
- (c) Must the unit weight of the stabilizing berm be greater than the weight of water?
- (d) What will be the effect of ground shaking on the existing soil and on the stabilizing berm?

C. Evaluation and Recommendation

- 1. Prepare a report and evaluation of results of composting and soil testing studies.
- 2. Recommend the most suitable mixture of compost and dredge spoil, and optimum method of placement on Mandeville Island.
- 3. Prepare an environmental assessment of recommended composting and placement methods.

D. Preliminary System Design

- 1. Prepare the preliminary design to include:
 - (a) Shredding and air classification facilities at San Francisco and Berkeley.
 - (b) Composting facilities at San Francisco and Berkeley.
 - (c) Loading facilities at San Francisco and Berkeley.
 - (d) Unloading facility at Mandeville Island.
 - (e) Compost placement design.
 - (f) Environmental monitoring system design.
 - (g) Engineering monitoring system design.
- 2. Apply for use permits and prepare environmental impact report.

E. Finalize Institutional Arrangements

Bring into being the Joint Powers Agency among counties, which will provide the local share of Phase II funding and operate the full-scale on-site Demonstration.

INTERGOVERNMENTAL RESPONSIBILITIES IN FOUR CRITICAL PROBLEM AREAS

PROBLEM	LOCAL AGENCIES/INDUSTRY	STATE AGENCIES	FEDERAL AGENCIES
1. Dredge Spoil Disposal	<p>Bay and Delta Area</p> <p><u>General purpose governments.</u></p> <p><u>BCDC</u></p>	<p><u>Department of Water Resources:</u> Water quality;</p> <p><u>Solid Waste Management Board:</u> Waste disposal.</p>	<p><u>Corps of Engineers:</u> Dredge disposal;</p> <p><u>EPA:</u> Water quality control, Waste disposal.</p>
2. Organic Waste Disposal (refuse, sludge, agricultural)	<p>Bay and Delta Area</p> <p><u>General purpose governments;</u></p> <p><u>Special districts;</u></p> <p><u>BASSA;</u></p> <p><u>Private operators;</u></p> <p><u>Farmers.</u></p>	<p><u>Solid Waste Management Board:</u> Waste disposal;</p> <p><u>Department of Health:</u> Safe/sanitary disposal;</p> <p><u>Department of Food and Agriculture:</u> Waste disposal;</p> <p><u>Water Resources Control Board:</u> Water quality, Pollution control.</p>	<p><u>EPA:</u> Waste disposal, Water quality control;</p> <p><u>HEW:</u> Health/safety related issues of disposal;</p> <p><u>Corps of Engineers:</u> General waste disposal, Water quality;</p> <p><u>Department of Agriculture - Research Service:</u> Waste disposal;</p> <p><u>Department of Interior - Geological Survey:</u> Land disposal of wastes;</p> <p><u>HUD - Housing and Community Development:</u> Community infrastructure, facilities, services.</p>
3. Levee Stability - Flood Control	<p>Delta Area</p> <p><u>General purpose governments;</u></p> <p><u>Reclamation Districts;</u></p> <p><u>DAPC;</u></p> <p><u>Landowners;</u></p> <p><u>Farmers.</u></p>	<p><u>Department of Water Resources:</u> Water resource management, water quality, flood control;</p> <p><u>Reclamation Board:</u> Flood control;</p> <p><u>Department of Parks and Recreation:</u> Recreational opportunities;</p> <p><u>Department of Fish and Game:</u> Wildlife resources;</p> <p><u>Department of Health:</u> Public safety.</p>	<p><u>Corps of Engineers:</u> Flood control;</p> <p><u>HUD - Federal Disaster Assistance Administration:</u> Flood control (\$5.4 million in grants for Isleton - 1972);</p> <p><u>Department of Interior - USGS:</u> Natural hazards, Bureau of Reclamation: Flood control, Bureau of Sport Fisheries and Wildlife: Wildlife protection;</p> <p><u>HEW:</u> Public safety.</p>
4. Land Restoration - Agricultural Productivity	<p>Delta Area</p> <p><u>General purpose governments;</u></p> <p><u>Landowners;</u></p> <p><u>Farmers.</u></p>	<p><u>Department of Food and Agriculture:</u> Productivity;</p> <p><u>U.C. Agricultural Extension:</u> Productivity, Soil management;</p> <p><u>Department of Conservation:</u> Soil resources management;</p> <p><u>Solid Waste Management Board:</u> Resource recovery (land resource);</p> <p><u>Department of Health:</u> Health-related issues of agriculture.</p>	<p><u>Department of Agriculture - Research Service:</u> Productivity, <u>Soil Conservation Service:</u> Land restoration, development of land resources;</p> <p><u>Department of Interior - Bureau of Mines:</u> Land restoration in strip-mined areas, <u>Bureau of Land Management:</u> Land restoration;</p> <p><u>HEW:</u> Health related issues of agriculture.</p>

PACE

Political Action Coalition
for the Environment

338 Lincoln
Alameda, CA 94501

October 10, 1975

00000
0

RECEIVED

OCT 14 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

Hiram Wolch, Ph. D., Chair
Alameda County Solid Waste Management
Plan Advisory Committee
399 Elmhurst Street
Hayward, CA 94544

Dear Chairman Wolch and Members,

At your last meeting I made some responses to Oakland Scavenger Company's letter of October 3rd criticizing your committee's recommendations. My copy of the letter was addressed to the Mayor of Alameda, but I understand that an identical letter has been sent to several other mayors in the county. Since I had not seen the letter until shortly before the meeting, I was not able to submit my comments in writing. With your permission, I would like to submit a brief outline of what I view as the major assertions in Mr. Borghero's letter and of PACE's responses to those assertions.

1. OSC objects to a statement in the SWMPAC recommendation "that no major long-term commitment, either to private or public enterprise, be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production and disposal."

It seems obvious that, if the SWMPAC planning process is to have any validity at all, no major commitment should be made that might be so contrary to SWMPAC's ultimate recommendations as to make them impossible to implement. It therefore seems clear that all major commitments should be postponed until the SWMPAC process is completed. Otherwise, the two-and-one-half years' work by your committee would be wasted. Making a commitment to a specific project at this time would invalidate the entire planning process.

2. OSC claims that the County Solid Waste Management Board would have a large staff that could require "an annual operating budget in excess of one-half million dollars."

This claim is totally unsubstantiated. The draft report calls for the board to have one coordinator and, presumably, some clerical support. The \$500,000 figure is a figment of someone's imagination. And Technical Report 22, on Institutional and Financing Alternatives, sets out in Chapter III a set of functional activities, no one of which requires the full-time services of a professional staff person. If the institutional concepts are accepted, presumably the County Administrator and the Board of Supervisors would determine actual staff requirements.

3. OSC says that plans for the County Solid Waste Management Board should be dropped at the present time and reconsidered if there is a need "to finance a large scale energy recovery program of \$50 million or more...."

This would, of course, allow OSC to take its own direction in solid waste planning without supervision by any County-wide public agency. There would then be no control over the planning direction until it was well underway and possibly irreversible.

Furthermore, several alternatives such as energy recovery are now under study. To allow one of the alternatives to proceed before the feasibility, costs, and benefits of all alternatives are evaluated and compared is to proceed in semi-blindness. The county-wide agency is essential to maintaining continuity in solid waste planning.

4. Page 4 of the OSC letter seems to contain two contradictory concepts. On the one hand, OSC says that primary responsibility for waste removal should be retained at the local level. This is in accord with a statement in Technical Report 22 that "In any administrative system which evolves, each city should retain the prerogative of franchise as well as require a degree of accountability." (page 17) On the other hand, OSC favors a county-wide coordinator, appointed by the Board of Supervisors, to coordinate the activities of various landfill-site monitoring and regulation activities.

If responsibility for waste removal is to be retained at the local level, an individual accountable to the Board of Supervisors is independent of the local level. A more logical method of providing coordination (and that is one of the lesser tasks PACE believes agency staff should be involved in) would be by formation of a county-wide joint powers agreement, which would insure local participation and the retention of local responsibility. Such a joint powers enforcement commission is precisely what your committee has recommended.

With respect to the modifications to the Preliminary Draft Plan recommended by OSC, PACE has the following comments:

1. Progress under the Joint Refuse Rate Committee has been slow, and cost data for what is essentially a public utility appear to be regarded by the Committee as proprietary. The Committee and its work could serve as a regulatory vehicle until a comprehensive, county-wide planning and regulatory agency in compliance with the requirements of SB-5 is created.
2. Fragmentation and laxity of enforcement of health and zoning ordinances (a finding of the Technical Advisory Committee cosmetically removed by a majority of your committee at its August 28th meeting) are common knowledge. Financial, legal, planning, and project evaluation functions of local government -- essential to the administration of an SB-5 plan -- are at best half-heartedly developed and implemented. These deficiencies clearly demonstrate

the need for a County Solid Waste Management agency. Any long delay in the establishment of such an agency will allow OSC to proceed with its own plans, which could well be contradictory to SWMPAC's recommendations.

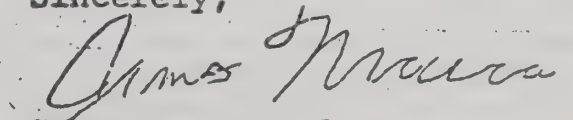
3. In order to obtain central coordination while retaining local control, the coordinator should be accountable to an agency created by a joint powers agreement.

4. Some kind of regulatory body is one of the requirements of SB-5. This OSC recommendation asks the councils to modify the SWMPAC draft plan in a way contrary to enabling state legislation.

5. If the Oakland Scavenger Company is allowed to ignore the SWMPAC recommendations and proceed with its own plans, the whole two-and-one-half year planning process would be invalidated, and the plan rendered meaningless.

In summary, the OSC recommended modifications, if accepted, would totally invalidate county-wide planning efforts, and would place primary control of solid waste planning firmly in the virtually unregulated hands of the Oakland Scavenger Company.

Sincerely,


James Maresca for
PACE SOLID WASTE MANAGEMENT
PLANNING COMMITTEE



CITY OF PLEASANTON

AREA CODE 415 846-3202

200 BERNAL AVENUE, PLEASANTON, CALIFORNIA 94566

October 16, 1975

Ms. Betty Croly
Assistant Director
Alameda County Planning Commission
399 Elmhurst Street
Hayward, CA 94544

Dear Betty:

Please be advised that the Pleasanton City Council has scheduled a public hearing on the Solid Waste Management Plan for October 28, 1975.

Attached hereto is a staff memorandum to the Council recommending changes which should be made in the plan. These comments, along with others, will probably be incorporated in the resolution sent to your office after the public hearing.

Very truly yours,


ROBERT J. HARRIS
Director of Planning

RJH/ym
Attachment

RECEIVED
OCT 16 1975
ALAMEDA COUNTY
PLANNING DEPARTMENT

MEMORANDUM

October 7, 1975

TO: Honorable Mayor and Members of the City Council

FROM: Director of Planning

SUBJECT: Comments on Solid Waste Management Plan and Draft EIR

ALAMEDA COUNTY
PLANNING DEPARTMENT

Environmental Factors - Sanitary Landfills

There are several short-comings with respect to the Draft Plan's environmental analysis of landfill sites. The first has to do with the synthesis of the various environmental factors into a generalized "environmental constraints" map; the second concerns the lack of any consideration toward the degree of risk should environmental degradation unexpectedly occur; the third concerns the location of sites vis a vis other uses.

1. "Environmental Constraints" Map. The map used in the Draft Plan is the same as the "Selected Physical Information for Alameda County, California" map. Adopting this map for purposes of the Draft Plan introduces the designation of "Q," or quarry land, while nowhere does the Draft Plan's environmental analysis consider quarries as different from other land. If land on the map is designated "Q," analysis of that land for sanitary landfill purposes should be undertaken. Otherwise, the land should be designated according to its environmental factors.

Because of the continuing proposals to utilize played-out, gravel quarries as landfill sites, a generalized environmental discussion of these proposals should have been undertaken as part of the Draft Plan and EIR. Pleasanton applauds the recommendation that each proposed solid waste facility be subjected to the EIR process but feels that a generalized analysis and recommendation with respect to the gravel quarries in the Amador-Livermore Valley should be contained in the Management Plan.

While the "Q" designation in the Amador-Livermore Valley does not show the existence of any environmental constraints, a cursory analysis shows these sites would receive an "unsuitable" rating according to the preliminary suitability evaluation in the following areas: (1) partially within flood-prone areas; (2) partially within 1,000 feet of a water-supply stream (Arroyo del Valle surface water feeds the Niles Cone water supply of the A.C.W.D.); (3) partially within 500 feet of a lake utilized for recreation (Shadow Cliffs); (4) within 1,000 feet of a major groundwater basin recharge area; (5) bottom surface below the ground water level; (6) soil permeability of greater than 2 inches per hour; (7) located in an area underlain by unconsolidated deposits and susceptible to severe shaking; and (8) arti-

facial lining to prevent vertical and lateral hydraulic migration of leachate would create an impermeable deposit near the land surface.

Since no mention of any of these factors being present in the "Q" designated areas within the Amador-Livermore Valley is made in the Draft Plan, that Draft Plan's environmental constraints section is inadequate. And, since the Draft EIR adopts the Plan's environmental analysis, it too is inadequate.

For the above reasons alone, Pleasanton is opposed to any landfill operations undertaken in the quarry areas of the Amador-Livermore Valley.

2. Landfill Standards - The adopted standards for sanitary landfills of each type allows for artificial barriers to be used to contain the leachate. Pleasanton recognizes that these standards must be general and recognizes that artificial barriers can be used effectively with landfill operations. Nonetheless, no artificial barrier can be said to be completely free from possible failure and, thus, Pleasanton feels some standard dealing with the magnitude of environmental damage due to failure of artificial barriers be incorporated into the standards for locating sanitary landfills. Pleasanton sees a significant difference between the degree of environmental harm if failure causes degradation of groundwater used solely for irrigation or if failure causes degradation of a municipal water supply.
3. Location of Sites vis a vis Other Uses - The Draft Plan calls for the protection of potential sites from encroachment of incompatible land uses. Pleasanton feels that in addition, the Draft Plan should include a statement of policy which would protect other uses from the encroachment of sanitary landfill operations. Since Alameda County's LAFCO sets what it feels are the ultimate boundaries of urbanization for a City, Pleasanton feels that if landfills are kept outside these boundaries, there should be little chance of incompatible land uses.

Recommended Changes

In order to include the above considerations in the Draft Plan, Pleasanton recommends the following changes be made to the Draft Solid Waste Management Plan:

- (1) Change the "Q" designation on the map to reflect the actual environmental qualities of the area. For those "Q" areas located within the Amador-Livermore Valley, these areas should reflect the environmental considerations listed earlier which make these sites "unsuitable" according to the preliminary suitability evaluation considerations. Only then can "Landfill Sites-Policies" #1, pg. VIII-2 refer to these sites.

AND, clarify "Landfill Sites-Policies" #1, pg. VIII-2, as follows:

"1. Land is a valuable natural resource. Only lands designated in the Solid Waste Plan and in the General Plan as being suitable for a disposal site according to the Solid Waste Plan's preliminary criteria should be considered as sites and these must be subjected to a critical review before approval as a site."

OR,

add a policy statement stating precisely that those areas designated "Q" within the Amador-Livermore Valley are not suitable for use as disposal sites.

- (2) Add as a policy on pg. VIII-2 that landfill sites be located only in areas where possible degradation would not affect a municipal water supply.
- (3) Add as a policy on pg. VIII-2 that future landfill sites be located outside cities' spheres of influence.

Finance

Although not set forth as a policy, language in the plan refers to solid waste as a county-wide problem. The public financing methods proposed contain no mention of whether the costs borne are to be county-wide or allocated to those areas served by the facility. Because Pleasanton may not be able to utilize the resource-recovery systems proposed until after the year 2000 (in two of the five 1990 schemes Pleasanton is projected to use only landfill disposal), it would seem unreasonable for Pleasanton's residents to have to pay for the recovery systems serving the Bay Plain. Pleasanton feels that methods to reduce disposal should be undertaken and recommends that it too be included in these plans. The valley planning unit is likely to be the site of any major landfill serving the Bay Plan and thus the Valley's residents would suffer the intangible costs of landfilling - the air pollution and noise from the trucks, the odor, the unsightliness, and the potential degradation of its water supply. To pay for the recovery systems it won't be able to use would be inequitable.

Recommended Change

- (1) Add as a policy to "Policy Recommendation - Funding and Financing, pg. VIII-18, a statement that those areas served by a Solid Waste facility should carry the burden of its financing.

Administration

The Draft Plan's Implementation Program, pg. VIII-26, does not contain sufficient definiteness with respect to the Plan's administration. Apparently, three different approaches are being considered at this time: (1) a large commission with equal representation for cities and special districts empowered with a joint exercise of powers agreement; (2) a board appointed by the County Board of Supervisors with similar powers; and (3) a single coordinator for plan management with powers retained by the local jurisdictions. Some decision will be made before the adoption of the Plan and input for this decision may be made here.

Each of the general proposals has both merit and drawbacks. For successful implementation of the Plan, it appears, however, that whichever type of management needs to have the power to act within the sphere of action allotted to the agency without local interference. A board of manageable size is preferable to one with representatives from each city and district - perhaps a plan giving equal regional representation (the four county planning units, for instance) would be preferable. The "coordinator-existing staff" recommendation found on pp. 1-6 and 1-7 appears to be a sound choice and should be incorporated into the implementation program found on pg. VIII-26. (The coordinator position should not have a salary in excess of \$20,000 per year.)

Recommendation

The City should decide which method affords the best protection for the City's interests and still provide for capable implementation of the plan. That recommendation should be included as a revision to the Plan Administration, pg. VIII-26.

Management/Operations

The administrative board/commission should have as a task, in addition to those stated on pg. VIII-27, the determination of appropriate landfill sites using the environmental constraints listed in the Plan and as added to in this report as a guide. Giving this task to the administration board would have this decision made by those fully aware of the Plan's policies and recommendations who could better protect against the proliferation of landfill sites and coordinate transfer stations' locations with landfill locations to attain the most beneficial environmental and economic location.

Recommendation

Add to Management/Operations, pg. VIII-27, the task of determining the appropriate location of landfill sites.

COVA - Statement of Response

1. That the plan adequately consider the concerns of communities regarding land use in the area of the proposed site.
2. That there be adequate monitoring of any transfer station, landfill site reclamation or recovery project.
3. That the Plan foster future energy production from organics.
4. That the Alameda County Solid Waste Management Plan be integrated with other solid waste plans to implement source reduction in order to require new packaging methods and future energy production for wastes.
5. That the practicability of a 67% recovery for solid waste by 1980 be questioned in light of current economics and the level of technology for energy recovery.
6. The Steering Committee of COVA objects to the formation of a new governmental agency for solid waste.
7. The Steering Committee supports the organization of an advisory commission with responsibility for coordination of this Plan.

PACE

Political Action Coalition
for the Environment

509 Athol #3
Oakland, CA 94606
Ph.: 465-1479
October 24, 1975

00000

RECEIVED

OCT 28 1975

City Councils and City Managers
of Alameda County Cities

Honorable Councilpersons and Managers,

ALAMEDA COUNTY
PLANNING DEPARTMENT

SUBJECT: Draft County Solid Waste Management Plan

State Solid Waste Management Board policy requires each county plan to provide for the recovery of 25% of the resources from the solid waste stream by 1980. We must recognize that we can no longer afford to waste irreplaceable raw materials, energy sources, and urban open space. PACE commends the Solid Waste Management Plan Advisory Committee for its conscientious work of over two and one-half years, and especially for its commitment to materials and energy recovery.

As indicated in County Planning Director William Fraley's letter to the City Managers, several important principles are embodied in the plan. It is our view that the central issues before each Council in appraising the plan are:

- Local jurisdictions are responsible for collection services and franchising for that service;
- Execution of a joint exercise of powers agreement between cities, special districts and the county, including the formation of a joint powers board with local representation;
- Adoption of the goal of at least 67% combined resource and energy recovery by 1980 and 92% by 1990 (alternatives 1980-C and 1990-C), with continued exploration of the option of composting;
- No major long-term commitment, either to private or public enterprise, until adequate study and comparison is made of efficiency and cost of collection, processing, resource recovery, energy production, and disposal.

No one of these issues can be resolved separately from the others. While collection is local, the issue of solid waste management requires county-wide attention, because most disposal will soon be carried on outside of the major solid-waste-generating areas. Moreover, efficient resource and energy recovery can only be achieved with quantities larger than those generated in any one county planning unit. Inter-jurisdictional planning and cooperation is therefore imperative.

PAGE's Solid Waste Management Planning Committee, whose fifteen members reside all over Alameda County, wishes to state its positions on three aspects of the plan which are apt to be controversial:

No Major Long-Term Commitment. PACE supports the plan principle that "no major long-term commitment, either to private or public enterprise," be made pending a full cost evaluation of systems.

Oakland Scavenger Company, in an October 3, 1975 letter circulated to City Councils and newspapers, implies that if it is not allowed to proceed immediately with its plan for a transfer station in San Leandro and a landfill in the Altamont Hills, the County will suffer imminent garbage disaster.

This is simply not true. Considerable dumping capacity exists in the Vasco Road, Livermore site, which has been offered for county-wide use. While PACE does not favor this as a long-term solution, we do believe it provides sufficient "breathing room" so that there is no need to abandon public planning in mid-stream.

Any solid waste disposal system will be financed either publicly (through taxes) or privately (through collection rate increases). Ultimately, the consumer pays. Public officials, therefore, must be involved in the formulation and evaluation of alternative plans so that the interests of consumers, as well as the profits of the collection industry, are safeguarded.

Oakland Scavenger complains that the no-major-commitment principle was adopted to foil their plans for, and investments in, the Davis Street, San Leandro site. But OSC's cited \$1 million investment is, in fact, almost entirely for the purchase of the Altamont landfill site. A smaller amount went to OSC's private study (done quite independently of the Advisory Committee) of an alternative which is most directly beneficial to OSC. So far as we know, OSC has made no direct expenditures on its proposed Davis Street facility, contrary to what was implied in its letter.

Therefore, delaying a public commitment to the Davis Street option will not be unfair to the Company. When private enterprise engages in speculation, it must assume the risks, as well as the profits, of the game.

PAGE notes that since 1957, the Davis Street site has been reserved in the San Leandro General Plan for recreational use. Bayshore recreational sites are at a premium. So far as we know, there has never been a comparative evaluation of possible industrial sites. No site should be approved until such a study is made.

Joint Powers Agreement and Board. PACE supports the plan principle that the present ineffective and fragmented system of partial enforcement of regulations by multiple agencies be changed.¹ We believe that

¹ Draft Plan, chapter VIII, Plan Policies and Implementation Program, especially General Findings, pp. 1-2, #10 - 13; Landfill Considerations, p. 3, #2; Hazardous Wastes, p. 4, #10-12; Special Wastes, p. 6, # 1(b); and Policy Recommendation - General Policy, pp. 23 -24, # 1-7. Also Solid Waste Management Plan Advisory Committee Preliminary Recommendation September 24, 1975, pp. 1-4.

the interests of public accountability, efficiency, and necessary expertise to fulfill a major public policy responsibility will be best served by a single, county-wide agency. The agency should be governed by an independent board, with staff specialists responsible for zoning, planning, and health and safety code enforcement. This approach will designate specific people to be responsible for the important work ahead, while still preserving intact the authority of local governments to either contract out or operate municipally the collection of solid waste.

Unfortunately, a coordinated response by local governments to solid waste problems is opposed by the Oakland Scavenger Company, which, in its October 3rd letter, raises the spectre of a "large staff which could require an annual operating budget in excess of one-half million dollars." In fact, the plan sets out no such proposal, and the enforcement agency discussed in general terms would probably be quite small, utilizing primarily staff in the Health Care Services Agency.

Source Reduction, Recycling, and Collection Innovations. PACE supports the plan principle calling for evaluation of application of a litter law and bottle bill on a county-wide basis. The Draft Plan recognizes the need for new local, state, and federal legislation aimed at reducing the quantity of material entering the waste stream; encouraging productive use of materials which are now discarded; and at altering tax structures and freight rates to eliminate discrimination against secondary (vs. virgin) materials.²

Implementation of these principles in Alameda County would augment the success of plan alternatives 1980-C and 1990-C, which would first separate out glass, metals, and cardboard, then recover energy from the remaining organic fraction by the pyrolysis technique.³

PACE urges City Council approval of the 1980-C and 1990-C plan alternatives, with two conditions:

- (1) Every feasible effort shall be made to reduce the amount of material entering the solid waste stream by encouraging source reduction (including container deposit ordinances similar to that adopted in Berkeley) and source separation and recycling systems (such as those now being tried in Portland, Oregon; Downey, California; and, under the auspices of the League of Women Voters, in Berkeley).
- (2) Local governments shall retain their option to allocate their solid wastes for composting (as has been proposed by Berkeley, with respect to the Bay Delta project) or power generation (as is now being considered by the City of Alameda's Bureau of Electricity).

We hope that your honorable Councils will move ahead by approving the plan.. As the Oakland Scavenger Company has stated, "The time for action and commitment is here."

Sincerely,

Louisa Jaskulski

Louisa Jaskulski for
PACE SOLID WASTE MANAGEMENT
PLANNING COMMITTEE

2 Draft Plan, Chapter VIII, pp. 9-12, 14-15, 21-22

3 Draft Plan, Chapter V, pp. 30-55, and Chapter VI, pp. 29-39.

Memorandum

To : Earl W. Mortenson

Date : October 23, 1975

Subject: Comments on Draft,
Alameda County Solid
Waste Management Plan

DLS

From : David L. Storm, Ph.D.

The Alameda County, Draft, Solid Waste Management Plan has been reviewed. Comments on the hazardous waste aspects of the Plan are discussed below:

1. On pp. II-7 through II-8, Industrial Wastes section, mention should be made that the State Department of Health has promulgated regulations (Title 22, Division 4, California Administrative Code) pertaining to the operational aspects of hazardous waste handling and disposal.
2. In "Description of Industrial Sources of Hazardous Wastes in Alameda County", pp. II-17 through II-19, summarizes the general types and numbers of industries in Alameda county that generate hazardous wastes and the general compositions of the wastes each industry produces. An estimation of the volumes and types of wastes handled within the County should be included. The latter would include a description of the types of treatment and recovery facilities available within the county (if any) and any private disposal facilities (if any) maintained by industries within the county.
3. In Pesticides, pp II-20 through II-21, should include an estimate of the number and types of used pesticide containers that are disposed of by burial at Class I and Class II disposal sites.
4. In Hospital and Medical Wastes, pp II-22 through II-24, include an estimate of the volumes and types of hazardous waste associated with hospital and medical waste which are generated.
5. In Section V, "Evaluation of Solid Waste Management Technology" pp V-52 and V-53, Residues, incinerator ashes are classified as Group 1 wastes by the State Water Resources Control Board and may be considered as a hazardous waste by the State Department of Health. These wastes would, thus, have to be handled and disposed of in accordance with regulations pertaining to Group 1 and hazardous wastes.
6. "State Policies and Plans" pp VII-2 through VII-3 should include: 6. State Department of Health.

The State Department of Health is mandated by the Industrial Waste Bill, AB 598, 1972 Legislation, to adopt regulations and standards for the handling, processing, and disposal of hazardous and extremely hazardous wastes, as defined, to protect against hazards to the public health, to domestic

October 23, 1975

livestock, and to wildlife. The Department must establish policies in regard to local participation in the management of hazardous wastes and in regard to adoption of varying regulations and standards for different areas of the State. It must also establish procedures for evaluation and coordination of research and development regarding methods of hazardous waste management and must render technical assistance to state and local agencies in the planning and operation of hazardous waste programs.

7. In "Findings - Hazardous Wastes", Item 1, no mention is made whether any hazardous or Group 1 wastes are disposed of by industries legally on their own property. This information should be available in the Regional Water Quality Control Board files. Item 9 is incorrect. AB 598 was passed specifically to fill the gaps that existed previously in the regulation of hazardous wastes. The State Department of Health, hazardous waste program is mentioned in Item 9, but the implication is that regulatory responsibility will remain fragmentary. Items 10 and 12 are true only for part of the short term. The State Department of Health will soon adopt detailed regulations on hazardous waste handling operations at hazardous waste sites, and it will soon implement a State-wide surveillance and enforcement program.
8. The Plan does not address hazardous or Group 1 wastes in either Section V, "Evaluation of Solid Waste Management Technology" or in Section VIII, B, "Plan Policies and Implementation Program, Implement Program". The plan should discuss alternatives to disposal at Class I sites with consideration of the special problems and conditions within the county. Alternatives may include treatment, recovery, or reuse. The assignment of functions should be included in the proposed plan also. With regard to hazardous waste, the specific distribution of responsibilities among the county agencies with regard to surveying waste production and managing practices and ensuring safe and legal management of hazardous and Group 1 wastes should be addressed.

DLS:syb

cc: Harvey F. Collins, Ph.D.

COMMENTS CALLED IN BY GAIL STANTON,
ORO LOMA SANITARY DISTRICT
October 20, 1975

Page 11-73

Table 11-23 misleading (I think moving the footnot from from 11-22 as you suggested would clear it up).

Page 11-74

Then, he says 17.8% in paragraph 2 is wrong; it would be 9% or so--(50%) is this correct?

Page V-3

Capacity of packer truck 50 gallons.

DEPARTMENT OF HEALTH

2151 BERKELEY WAY
BERKELEY 94704

(415) 843-7900

October 22, 1975

RECEIVED
OCT 28 1975ALAMEDA COUNTY
PLANNING DEPARTMENT

Dr. Hiram Wolch, Chairman
Alameda County Solid Waste Management
Plan Advisory Committee
c/o County Planning Department
399 Elmhurst Street
Hayward, California 94544

Dear Dr. Wolch:

In response to a request to review the preliminary draft of the Solid Waste Management Plan for Alameda County, we have attempted to concentrate primarily on the public health aspects of the various phases of solid waste handling with emphasis on vector and hazardous waste concerns. The format for our review follows an outline of eight major parts. A checklist of pertinent questions for each part are reproduced in this letter with comments.

Part A. Development of the scope of the Plan

1. Does the Plan identify existing and estimate future types, locations, characteristics, quantities and fluctuations of each type of waste listed below?
 - a. Sewage sludge
 - b. Agricultural crop residue
 - c. Animal manures
 - d. Hospital/infectious waste
 - e. Hazardous waste
 - f. Chemical toilet waste
 - g. Septic tank pumpage

Comment:

The Plan reports the production of 58,900 tons of animal manure produced in the County in 1967. An inventory needs to be made during the early stage of the implementation phase to update and determine the different types and quantities of animal manure and related management practices. The same type of inventory is needed for hospital/infectious waste, chemical toilet waste, and septic tank pumpage. The County, in cooperation with the State Health Department, has already initiated an inventory of the hazardous waste. These inventory activities would be part of the tasks listed under Element 1, Plan Administration, design and implementation of a management information system for waste management activities.

2. With regard to each of the above waste stream constituents, have the following points been fully considered?

- a. Where applicable, were other counties or regional areas considered that may influence present or future solid waste management efforts in the development of the Plan?

Comment:

The exportation of over half of the food processing waste in the County to other out-of-county areas may be in jeopardy during the mid term and long range period. The Plan needs to consider other alternatives including resource recovery or land spreading and reclamation in the eastern part of the County. Contra Costa County food processing industries are investigating land spreading in the eastern part of their County.

- b. Does the Plan address the short, medium, and long range management/planning objectives for health protection?

Comment:

The medium and long range planning/management tasks appear to be only concerned with resource recovery. Are the other elements listed concerned with tasks just for the short term period? How do the tasks relate to the objectives of the Plan and what is the basis for measuring accomplishment of tasks toward the objectives?

Part C. Storage of waste for collection

5. Does the Plan provide for the proper and sanitary storage of waste (include all phases of solid waste handling) to control rodents and vectors and protect public health? Included should be:

- a. Ordinance with insect and rodent preventive features needed to implement effective storage.

Comments:

The current local regulations governing the storage of refuse for each jurisdiction needs to be reviewed and analyzed to determine if these meet current standards and guidelines. Such recommended changes might affect the economies and franchise requirements for the collection system. For example, suggested State Health Department guidelines call for containers made of galvanized steel or other comparable vector resistant material, and equipped with tightly-fitted lids. Container size should not exceed 32 gallons for single family dwellings, and a two can service is recommended.

Refuse bins should be in clean, sound condition, free from putrescible residue. In situations where routine cleaning is impossible, a suggested alternative is that the owners of refuse bins place all putrescible refuse in sealed plastic bags prior to storage. The bins should be equipped with lids that exclude the entry of rats.

There may be a need to consider the problem of animal waste from commercial and private horse stables in or near suburban developments: This is a special waste problem in neighboring counties that doesn't fit into the agriculture waste standards or the present franchise system's refuse removal. Standards would need to be developed for the storage, collection, and disposal of this type of waste if it is considered a problem in Alameda County.

The Plan should provide for an organized program for regulating the size, placement, length of storage time, and type of material received in bins used for storing, building, and demolition refuse. San Francisco has a debris box program requiring permits.

- b. Hazardous and toxic waste storage conforming to all public health requirements. (See attached comments on hazardous waste).

Part D. Collection Systems

6. Are the health related aspects of the following adequately treated?

- a. Stipulation of minimum removal frequency, both regulations governing collection frequencies and sub areas of different collection frequencies.

Comment:

The Plan alludes to a collection frequency of once weekly in residential, incorporated areas. Are there provisions for mandatory collection of at least one collection per week in urbanized unincorporated areas? Also, do all cities require mandatory refuse collection?

Does each collection system have a basic refuse service that also includes backyard rubbish removal?

- b. Recognition and treatment of problems of unsatisfactory collection services.

Comment:

The County Environmental Health Division reported in 1972 that 1532 garbage complaints were received and investigated. The nature of these complaints were defective garbage storage conditions, lack of service, or need for a higher level of service for the background litter problems. During the same period, 1508 rat complaints were recorded, approximately 75% of which were associated with defective refuse handling. The Environmental Health Division reported that the number of complaints involving defective refuse handling for 1973-1974 are comparable to the 1972 data. Current cost of servicing complaints averages \$25.00 per complaint in terms of wages, travel, and administrative cost.

There is no evidence in the Plan that community clean-up programs are used to remove residential rubbish that does not enter the routine collection service. In other counties, some municipalities provide a twice yearly clean-up service as part of the franchise requirements. The Plan indicates that the estimated franchise fees returned to the cities and the sanitary districts for all the County is \$1,309,400. No mention is made as to how these fees are used to administer the franchise, e.g., surveillance, investigation of complaints, and any additional clean-up service that may be provided to the communities.

In section 17331 of the Solid Waste Management Board's minimum standard for frequency of refuse removal, the local health officer shall require more frequent removal of refuse if it is deemed necessary to prevent propagation of vectors. The Plan should contain a statement of the health hazards of the present collection system and identify those areas where increased refuse removal is needed. An analysis of the Environmental Health Division complaint data would help to determine the areas of need. It would also be of value to have data on the percentage of households in franchise areas that do not have regular refuse removal.

Part E. Recovery, disposal, and processing of wastes

7. Is the health and safety aspect as well as the hazardous waste management aspect in each of the following areas fully discussed?
 - a. Regionalization of hazardous waste resource recovery facilities? (See attached comments on hazardous waste).
 - b. Analysis of community growth patterns for possible conflict with proposed solid waste facilities.

Comment:

The Plan lists a number of possible alternatives for disposal and resource recovery/transfer facilities. However, specific locations and methods are pending further study and selection. The buffer zone concept would need to be considered as one factor in the final selection of a disposal or recovery system.

- c. Consideration of source separation or collection center for any planned resource recovery system for hazardous waste facilities. (See attached comments on hazardous waste).
- d. Standards of disposal or processing site design.

Comment:

The findings in the Plan indicate the present system of refuse disposal does not meet the Solid Waste Management Board's minimum standards for operation of sanitary landfills. All future sites operating as Class I and II should be sanitary landfills closely monitored by the Environmental Health Division.

Mention was made that in several situations sewage sludge was used in public parks and in nurseries. Sewage sludge standards currently being developed by the State Health Department would not allow the use of sludge in this manner without further processing and treatment.

Part F. Plan administration

8. Is some health agency responsible for the health and safety aspects of waste management?

Comment:

The Plan recognizes the role of the Health Services Agency in the investigation of health hazards and inspection of disposal sites. In the development of a new solid waste management ordinance the Health Department's Environmental Health Division needs to be clearly identified as having the key responsibility for surveillance, enforcement, setting standards, and program evaluation of all aspects of solid waste handling pertaining to health and safety considerations.

The revised preliminary recommendation dated September 22, 1975 indicates in the Plan Administration that a five member Solid Waste Enforcement Commission will be established and one of its duties is to act as a hearing board. This enforcement responsibility may conflict with County Health Officers' powers to conduct hearings on environmental health matters.

It was somewhat difficult to comment on the Plan in much detail because the specific information on how and when the health standards will be integrated into the Plan are pending further developments during the implementation phase. If you have any questions concerning this review, please contact our office at 415-843-7900, Extension 552.

Sincerely,

VECTOR CONTROL SECTION

Earl W. Mortenson/n.z.

Earl W. Mortenson
Region I Supervisor

EWM/jm

Attachment

cc: R. F. Peters, Chief

EAST BAY CHAPTER OF THE CALIFORNIA COUNCIL
OF CIVIL ENGINEERS AND LAND SURVEYORS

PRESIDENT

Richard A. Nystrom

VICE-PRESIDENT

Robert J. Silva

SECRETARY

Robert L. Floyd

TREASURER

Roger D. Higdon

OFFICE OF THE SECRETARY:

1233 Alpine Rd. - P. O. Box 287
Walnut Creek, California 94597
Phone 939-6500

OFFICE OF THE TREASURER:

37217 Fremont Boulevard
Fremont, California 94536
Phone 792-4560

RECEIVED
NOV 3 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

November 3, 1975

Planning Department
County of Alameda
399 Elmhurst Street
Hayward, CA 94545

SOLID WASTE MANAGEMENT STUDY, ALAMEDA COUNTY


Gentlemen:

The East Bay Chapter California Council of Civil Engineers and Land Surveyors have received the copy of the Solid Waste Management Study which was forwarded to us for review and comment.

As an organization we feel it inappropriate to express opinion and/or comment on the technical aspects of the study. However, we will express our opposition to creation of a county wide solid waste management authority to administer the proposal. We feel private enterprise is already doing a more than adequate job of solid waste collection and disposal under franchise from the governing jurisdiction.

Individual members of our organization with expertise in this field either have or will be making comments on the study.

Very truly yours,


Richard A. Nystrom
President

RAN:eo

November 12, 1975

Mr. Wm. H. Fraley, Planning Director
ALAMEDA COUNTY PLANNING DEPARTMENT
399 Elmhurst Avenue
Hayward CA 94544

RECEIVED
NOV 13 1975

ALAMEDA COUNTY
PLANNING DEPARTMENT

Dear Mr. Fraley:

Your letter of November 3, 1975, requested our specific comments on the Preliminary Draft of Alameda County's Solid Waste Management Plan (and Draft Environmental Impact Report and Dr. Wolch's letter to Mr. Carpenter dated September 22, 1975, transmitting the Advisory Committee's recommended Plan Summary amendments). EBMUD in general concurs in the plan and has no objection to its contents nor to the Advisory Committee's recommended amendments.

Whether EBMUD subsequently might become involved as an owner/operator of the resource/energy recovery facility proposed in the Plan for future implementation will depend on many factors, such as:

1. A strong mandate rising from the public for EBMUD to assume such a role, followed by appropriate legislative action.
2. Assurances through legislative or regulatory franchise control that a continuous, long-term supply of solid waste can be guaranteed.
3. A satisfactory long-term contract for the sale of the energy or other product of the facility.
4. That the resource/energy recovery equipment can be procured and the facility constructed in accordance with competitive bidding statutes.
5. A successful Bond Election to provide financing for the energy recovery facility.



Mr. William H. Fraley

2

November 12, 1975

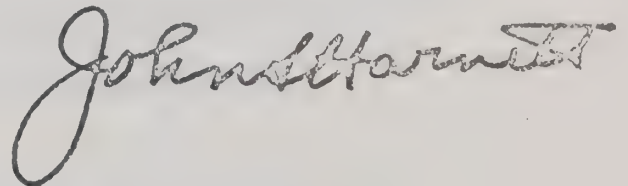
Furthermore, before the District could consider pursuing an owner/operator role, it would have to be satisfied that other types of public ownership/operation have been thoroughly investigated and considered in comparison with an EBMUD role.

It is noted that no mention is made of the Regional Municipal Wastewater Solids Management Study to be conducted under a joint exercise of powers agreement between East Bay Municipal Utility District, City and County of San Francisco, City of San Jose, Central Contra Costa Sanitary District, and the Bay Area Sewage Services Agency. EBMUD will be the lead agency in this study to consider long-term solutions for wastewater solids management in the Bay Area. Any wastewater solids management plans developed as a part of this study will be designed to be compatible insofar as possible with regional and subregional solid waste planning. The State Water Resources Control Board will be responsible for coordination of the planning efforts with the State Solid Waste Management Board.

The District has appreciated the opportunity to participate on the Technical and Advisory Committees.

Very truly yours,

cc: J. K. A. Harral, PG&E

A handwritten signature in dark ink, appearing to read "John H. Harral". The signature is written in a cursive, flowing style with a large initial "J" and a long, sweeping underline.

City Manager

Cecil S. Riley

November 13, 1975

Director of Public Works

Alameda County Draft Solid Waste
Management Plan

At the November 11 work session on solid waste management, the City Council requested additional information in order to arrive at conclusions as requested by the Alameda County Solid Waste Management Plan Advisory Committee. In addition to the staff report dated November 6, 1975 the following is provided:

1. Letter from Chairman Hiram Welch of the Plan Advisory Committee to the Alameda County Planning Commission dated September 24, 1975.

a) Preliminary recommendations

- 1) Adopting 1980-C and 1990-C plans
- 2) Underlying concepts
 - a. Separation of enforcement and management
 - b. Structure
 - c. "that no major long-term commitment, either to private or public enterprise be made until adequate study and comparison is made of efficiency and costs of collection, processing, resource recovery, energy production and disposal."
 - d. Joint powers board
- 3) Proposed organization
- 4) Preliminary recommendation - policy, administration management and operations.

b) Draft plan summary

2. Letter from William H. Fraley, County Planning Director, dated October 20, 1975 to City Managers of Alameda County cities commenting on requested city responses to the Draft Plan.

City Manager

November 13, 1975

3. Letter from Oakland Scavenger Company dated October 3, 1975 to Mayor Reading expressing the Company's concerns.
4. Letter from William H. Fraley, County Planning Director dated October 27, 1975 to Alameda County Planning Commission commenting on Oakland Scavenger Company letter.

The City Council requested additional staff comments on the proposed "Management Board," including makeup and duties. The board is indicated in reference 1, a., 3) above and detailed on the following page. The proposal provides a nine member board composed of two members from each of four solid waste planning units selected by the cities and one member appointed by the Board of Supervisors. The management board would result from the authority detailed in a joint powers agreement evidently joined by all cities, special districts, and the county. The management board would be directly involved in the items of policies shown in the Draft Plan Summary (attached and noted as reference 1. b above) pages 1-6, 1-7 relating to administration management/operation, legal and legislative, finance, regional coordinating, public information, and research and planning. The board would be charged with responding to the policies established by the State Solid Waste Management Board.

The Advisory Committee for the Draft Plan suggested a board makeup involving representatives from four solid waste planning units covering the entire county. The planning units upon which the proposed board is based are comprised as follows:

1. Central Metropolitan Planning Unit.
 - a) Agencies - Alameda, Albany, Berkeley, Emeryville, Oakland and Piedmont.
 - b) Approximate population - 594,000.
2. Eden Planning Unit.
 - a) Agencies - San Leandro, Hayward, unincorporated areas of San Lorenzo and Castro Valley.
 - b) Approximate population - 274,000.
3. Washington Planning Unit.
 - a) Agencies - Fremont, Newark, Union City, small unincorporated area.
 - b) Approximate population - 182,000.

City Manager

November 13, 1975

4. Livermore-Amador Planning Unit.

- a) Agencies - Livermore, Pleasanton, large unincorporated areas such as Dublin, etc.
- b) Approximate population - 97,000.

One of the obvious problems in the proposed management board is the imbalance in the representation in that the Central Metropolitan Planning Unit representing over one half of the population has less than a quarter of the total vote on the board. In matters involving financial considerations this imbalance is more exaggerated when the assessed valuations are considered.

Brief reference was made in a letter from the Political Action Coalition for the Environment (PACE) dated November 10, 1975 and presented to the City Council during the work session, and in subsequent verbal testimony by a representative of the organization, of the possibility of using the East Bay Municipal Utility District (EBMUD) as the planning agency for implementation of the plan. As was pointed out to the Council at that time, the ability of EBMUD to function on a county-wide basis is curtailed at the present time by legislatively determined boundaries. The southern and eastern portions of the county are not included in the District's jurisdiction. The expansion of the geographical limits of the District requires action of the State Legislature to in effect create a special district for waste disposal activities. Preliminary discussion with EBMUD staff indicates that the agency is primarily concerned with the disposal of residue wastes from sewage treatment facilities and is thus interested in various forms of resource recovery but does not have an interest in acquiring duties relating to other forms of solid waste.

STAFF RECOMMENDATIONS

1. City Council response to the Draft Plan state that any organization of a Solid Waste Management Board through the joint exercise of powers procedure must reasonably balance the relative factors of population, assessed valuation, and refuse generation as well as natural geographic or political boundaries. A special district should not be created or expanded to deal with the administration of solid waste management.

The other staff recommendations that should be considered in reply to the Draft Plan are as outlined on page 8 of the staff report of November 6, 1975 on the subject. These recommendations with brief comments are:

2. Recognition of the need to resolve the short-range (and intermediate long-range) disposal requirements without delay (or

City Manager

November 13, 1975

protracted study).

The intent of the "no major commitment" recommendation was debated at the work session with varying interpretations. The suggested modification to add "no major long-term commitment inconsistent with the plan" does not really satisfy the staff concern for immediate disposal needs since, as stated by several participants in the November 11, 1975 work session, the Draft Plan is not a facility plan. The need for a transfer station and adequate disposal facilities that are reasonably unhampered by "phasing or holding devices" so as to enable adequate financing capability should be recognized without qualification.

3. The retention by local agencies (cities and special districts) of determination of level of service, rate setting determination, and franchise fees requirements though inferred in the Draft Plan should also be positively stated without subsequent qualification.
4. The powers of the proposed management board, anticipated size and level of staff needs, and practical considerations of resource recovery abilities should be a critical issue to be resolved by the joint exercise of powers authority created for this purpose. (See 1 above.)
5. The retention of the County Health Services Agency as the enforcement arm of the solid waste board would eliminate some of the proposed bureaucracy. This recommendation is based on the small number of disposal sites, transfer stations, and other processing units anticipated.
6. Based on the testimony at the work session, staff would revise the recommendation that the Joint Refuse Rate Determination Committee be expanded to become the joint exercise authority, however, the efforts of this committee should continue to function and should be included in the plan.

The City Council also requested a staff response to the PACE letter of November 10, 1975 regarding the specific actions of the Joint Refuse Rate Committee (JRRC) in its determinations for establishing collection rates for the individual jurisdictions served by the Oakland Scavenger Company.

In its conclusion, the letter states that the JRRC has failed to forestall the "crisis" of solid waste disposal. The Committee was established to develop a sound mechanism for determining rates to be charged to users of Oakland Scavenger Company collection services. As such, the Committee has not had the charge to oversee operations of the Company and the development of long-range disposal plans.

City Manager

November 13, 1975

Reference is made in the letter to a status report submitted to the City Council on August 21, 1975 concerning the work of the Rate Committee. That report contained four major points related to rate setting. These same four items served as the primary points of discussion in the PACE letter of November 10, 1975. The Joint Refuse Rate Committee is a subcommittee of the Joint Solid Waste Committee. The August report was a progress report of the work of the Rate Committee and had not been reviewed by a committee of the whole. The determinations of the subcommittee were therefore tentative. Subsequently the committee of the whole decided that each jurisdiction would set its collection rates and that dump operations would be considered in the establishment of rates (Points 1 and 2).

With respect to point three of the August report and the PACE letter, the Rate Committee felt that the market for recycled paper (primarily newsprint) has proven to be so unstable that its inclusion in the rate setting process would be unwise. In other words, inability of Oakland Scavenger Company to market paper would result in a negative benefit to user in the form of potential collection rate increases. This does not mean however, that the Company should not be encouraged to develop continuing markets for the paper and in turn be regulated through the rate setting process when benefits are consistently realized from such operations. There is nothing to prevent inclusion of this item in future rate setting processes.

Point four of the PACE letter relates to the length of franchise agreements with the Oakland Scavenger Company. The Joint Refuse Rate Committee has recommended consideration of a 15 year agreement with an option provision of a 10 year extension in order to provide for proper apportionment of costs to users of Company facilities. It would seem improper to equate this action with a commitment to handle all disposal through landfill operations. It merely provides the necessary facilities to handle solid wastes in conjunction with available technology for resource recovery. All parties who have expressed opinions on the County Waste Management Plan have recognized a need for landfill operations for any residues once recovery operations have been exhausted. It would not be staff's position to abandon the planning process for resource recovery and disposal by execution of a long-term franchise agreement for collection.

In summary, it is recommended that the work of the Rate Committee not be stifled in any way as a result of the PACE letter. All actions taken by the Committee must ultimately be approved by the City Council before implementation. Coordination of this group with the county agency to be developed for waste management is imperative if we are to have a consolidated effort in managing the entire solid waste system. It is further recommended that the City Council consider the recommendations (1 through 6)

City Manager

November 13, 1975

outlined above in their response to the County on the Draft Plan submitted.

JAMES E. McCARTY

JEM:jhh
Attach. 1 - 4

Approved and Forwarded to the City Council

Office of the City Manager

CITY OF BERKELEY



CITY MANAGER'S OFFICE
2134 GROVE STREET

BERKELEY, CALIFORNIA

(415) 644-6580
94704

November 14, 1975

RECEIVED
NOV 20 1975

Mr. William E. Carpenter
Chairman
Alameda County Planning Commission
399 Elmhurst Street
Hayward, California 94544

PLANNING COMMISSION

Dear Chairman Carpenter:

At its meeting of November 11, 1975, the Berkeley City Council unanimously endorsed the changes in the Preliminary Alameda County Solid Waste Management Plan which was recommended by our Solid Waste Management Commission in the enclosed report. We hope it will be possible for the County Planning staff to revise the draft report to reflect the concerns raised by the City of Berkeley.

The City Council has requested our Solid Waste Management Commission to hold a public hearing on the final plan shortly after it is received. To facilitate public input into the public hearing, it would be extremely desirable if a concise summary of the entire plan - including the recommended policies - could be prepared by the County and be made available in sufficient quantities for some public distribution.

Berkeley supports the cooperative city/county effort which has gone into the development of the preliminary plan. The Council has scheduled action on the final plan for its meeting of January 13, 1976.

Sincerely,

John L. Taylor
City Manager

cc: Members of the Solid
Waste Management Commission

CITY OF BERKELEY



SOLID WASTE MANAGEMENT COMMISSION

(415) 644-6468

2105 GROVE STREET

BERKELEY, CALIFORNIA

94704

FOR COUNCIL ACTION

November 11, 1975

To the Honorable Mayor and
Members of the City Council

Subject: Review of Preliminary Draft, Alameda County Solid Waste
Management Plan

Although the time provided by the County is inadequate for thorough consideration of such an extensive document, the Solid Waste Management Commission presents its comments to date as background information for public hearings to be held and resolutions to be considered regarding the current draft of this plan. There are three major areas of concern on the part of the Commission, with several components to each, discussed below. Following these major issues is a brief discussion of two policy issues strongly dependent on data in the plan that is open to question. Appended to this memorandum are the detailed comments of two Commissioners which provide criticisms of questionable data and further illustrate several issues of varying degrees of magnitude.

To summarize the recommendations of the Commission at this time, the current draft of the County plan is sound in its approach and in attitudes toward coping with the problem of reclaiming valuable waste and disposing efficiently of other waste. It is a very general plan in terms of proposed implementation activities, but the wealth of data and discussion within it makes the plan a good starting point for further effort. The several serious issues discussed below, however, suggest that a qualified endorsement of the plan be made at this time in conformance with the criticisms detailed below.

I. Joint Powers Board. The principal policy-making body recommended in the plan is a board resulting from a joint exercise of powers agreement to be entered into by the County, the cities and special districts. The Plan Advisory Committee has further recommended that this Board be composed of two members from each of the four County Planning Units selected by the cities and one member selected by the Supervisors.

More examination of alternatives is needed in the plan. There are three issues within this one that deserve greater discussion: whether representation

Alameda County Solid Waste Management Plan

on the policy-making body responsible for solid waste management should be on an area basis (as is the present recommendation); on a population basis (as Berkeley might well desire, being a dense urban area); or on a jurisdictional basis (with each city assigned one vote); whether such a body ought to be composed of persons appointed by other bodies, even if they are elected officials, or of persons directly elected to serve on such a body; and whether responsibility for solid waste management planning and implementation ought to be assigned to a wholly new body or to an existing public agency?

The area vs. population representation issue needs little elaboration. To the extent that residents of the County will have their lives and their pocketbooks affected by the actions of such a body, they may strongly desire equal representation in the decision-making process. This speaks also to the issue of direct election. If the plan implementation agency is analogized to a special district such as EBMUD or Regional Parks, with considerable operational responsibilities and a directly elected board, or to a typical County agency, with responsibilities delegated by the Supervisors and a board appointed by them, or to a joint exercise of powers organization like ABAG, composed of appointed elected officials, the dimensions of this issue can be seen. The degree of representative accountability is central here, given the degree of potential impact on fiscal and environmental affairs. Finally, an existing agency such as EBMUD, with its statutory charter extended to meet new needs, should be considered in the plan as an alternative to a new board because of its existing technical, legal and logistical capabilities. While no existing agency may be ideally suited to the job, such a designation would avoid the cost and effort of creating a new one.

II. Plan Management and Administration. The draft plan recommends that a coordinator be appointed to report to the joint powers board on matters regarding implementation and management of the plan. It also recommends that operational responsibilities be delegated to existing County agencies, with the coordinator to be responsible for assuring the orderly conduct of affairs among these various agencies. This structure is not intended to include enforcement of solid waste management regulations which is to be assigned to another coordinator within the County Health Care Services Agency, under the policy direction of a separate County Solid Waste Enforcement Commission.

More discussion of alternatives is needed. Although the nature and magnitude of the staff effort which will be required to implement the as yet unfinished plan is not yet clear, serious consideration must be given to other organizational means, most obviously the creation of a new, single Solid Waste Management Administration Agency. The idea that existing agencies, created to deal with problems at best tangential to solid waste management, accountable to persons or bodies not directly concerned with this subject, and coordinated by one powerless individual acting on behalf of the joint powers board, can adequately implement this plan seems unrealistic. If there is to be a new Solid Waste Commission at the County level, it will need a responsive, effective and accountable staff to carry out its mandate. To scatter responsibility among various agencies may very likely have the result of crippling effective governmental action from the outset, with the corresponding result that private enterprise may control the County's effort with no direct input from the County's people. The plan includes no discussion of alternative modes of organization for management. Certainly the reasons behind the recommended

structure ought to be clearly spelled out, and moreover reasons supporting alternatives should be made a part of the plan.

III. Alternative resource recovery systems. Although the Commission is in general agreement with the resource and energy recovery goals enunciated in the plan (67% recovery by 1980 and 92% by 1990), more information and consideration of two specific alternative methods is needed. A better discussion of composting and of the Bay Delta Project should be included in the plan. The draft devotes only little more than a page (V-27, 28) to a brief description of the Bay Delta Demonstration Project's composting program, in the form of a publicity release. Although the plan's recommendations provide for further study of composting as a waste management/recovery technique, there is a need for more technical and economic information on this method.

More information and discussion is also needed of source separation. Commissioner Harrison's comments on this issue, appended, provide substantial detail in elaboration of this point. In the plan, again but one page (V-4) is devoted to this method which, while it relies on the efforts of individual households and businesses, has proven its value in Berkeley to a moderate scale and is capable of achieving higher quality and quantity resource recovery than is possible in the so-called "front-end" systems. It may not prove feasible at a County-wide scale, or even in Berkeley. (The current League of Women Voters demonstration project in conjunction with the Commission will evaluate such feasibility.) But it deserves more serious consideration than it has been given, especially because its cost would be at least an order of magnitude lower than the complex front-end systems evaluated in the plan.

IV. Transfer stations. Part of the solid waste management systems evaluated in the plan is the idea of several transfer stations within the County for the consolidation and processing of waste before shipment to a central processing and disposal facility. At issue is not the desirability of such stations (and in fact the City Council has purchased land and the Solid Waste Management Commission is working on the design of such a station in Berkeley). Rather, the issue is the number and location of stations that will be needed, and the accuracy of cost data for various modes of transport. Pages VI-22 through VI-24 of the plan discuss these costs, and they are at significant variance with the costs embodied in a report prepared for the County by an interdisciplinary student/faculty group at U.C. under the direction of three faculty members, one a present and one a former member of this Commission. In Solid Waste Management Alternatives for Alameda County, (June 1974) pages 13-15 discuss the economics of transfer stations and implications for siting. The variation in cost data calls into question the County plan in this area and suggests the need for further examination and validation.

V. Volume of Resources Recovered. Another element of the front-end system proposed for the County is the economic value and the quantitative relief from the waste stream of resources recovered from solid waste. Projections on pages V-50, 51 of the plan are subject to challenge on the basis of a footnote to the first of the tables on those pages which states that "Municipal fraction is assumed to be half of the total generation." With no further substantiation of this assumption, the estimated waste generation in the County is suddenly discounted by 50% for the purpose of estimating the volume and value of materials recoverable from such waste. Certainly, firmer statistics are needed to substantiate the degree of economic reasibility of the system, which may be considerably greater than the present plan indicates.

APPENDIX A

A. Projected Rate of Increase in Refuse

The plan projects a 1% increase in refuse generation per capita annually. While this rate of increase is conservative from the point of view of planning for the maximum amount, it is radical from the point of view of projected revenue from resource recovery. It is entirely possible that the per capita generation of refuse will decrease. This has happened in a number of communities across the country in the last few years, including Berkeley. Berkeley's per capita generation, based on the amount of refuse going into the Berkeley Landfill, is 3.76 pounds per capita (p. 12 "Development of a Solid Waste Processing-Transfer Station in the City of Berkeley," Peter Y. Chiu, June 6, 1975, prepared for the Berkeley Solid Waste Management Commission) compared with the 5 pounds per capita figure used in the report for the County as a whole. The implication of a possible lower generation rate should be fully explored in terms of potential resource recovery and system capacity.

B. Source Separation

Source separation is not properly considered both as an alternative to capital-intensive, mechanical resource recovery systems, or in terms of the impact on other systems. Source separation and separate collection systems (which rely on the householder to separate recyclable material and then collect these materials segregated from the rest of the refuse) have these advantages over the front-end resource recovery systems detailed in the draft plan:

1. It is a tested method; there are over 25 communities across the country where comprehensive separate collection systems are working. Locally, Berkeley has had a once-a-month collection of newspapers door to door for 2-1/2 years, and has a pilot program to collect cans, glass and newspapers operating weekly in three parts of the city. Modesto has collected glass, cans and newspapers throughout the city every week for over a year, and the program is virtually self-supporting. In Marin a pickup of glass, cans, newspapers and MIXED PAPER will start next month. The inclusion of mixed paper will greatly increase the proportion of material diverted from landfill and recycled. On the other hand, most front-end systems which handle more than iron are still in the demonstration or pilot stage.
2. Separate collection systems are labor-intensive and create low skill jobs which are badly needed in this county. The low capitalization would permit their rapid expansion throughout the county in areas suited to this approach.
3. Source separation with separate collection or recycling centers are educational and promote source reduction.
4. Mechanical front-end systems are currently only effective in removing iron and a low grade of glass from mixed refuse. Effective separation of clean, color-sorted glass and ferrous metals are still in the pilot or demonstration phase, and once contaminated with garbage, the paper obtained from front-end recovery systems is of such a low grade that

Appendix A

there is a very limited market for it in this area. Based on a study of on-going separate collection programs, a comparison is attached which shows the amount of revenue which might be obtained with a county-wide separate collection system and the estimates for resource recovery from front-end systems given in Table V-7, page V-51, of the plan. A 50% participation is assumed, current conservative market prices for source-separated material are applied, and the same conservative assumption is made that half of the County's generated waste is from municipal sources, and that there would be no resource recovery from the balance.

Additional material and revenue could be obtained from the addition of mixed waste paper, magazines and high grade office paper to the list of items collected.

The high potential indicated by these estimates shows that much more attention should be given to this method of resource recovery than has been included in the present plan.

C. Industrial and Commercial Wastes

Although the plan points out (Table II-5, page II-14) that residential refuse makes up only 35% of the waste in the county, little attention has been directed toward other types of waste and the potential for resource recovery. Commercial waste makes up 43% and has a high percentage of paper in it. (Page II-17 indicates that there are 625 metal fabrication firms in the county.) The county should look for ways of stimulating resource recovery from this portion of the waste stream. Materials are usually available in larger volume and in greater purity from each source than residential waste. Perhaps incentives could be provided for those firms who recycle this material.

D. Source Separation of Office Wastes and Corrugated Container Waste by Governmental Agencies

Recently the Environmental Protection Agency published proposed "Solid Waste Management Guidelines for Source Separation" (Federal Register, Vol. 40, No. 181, September 17, 1975). Included in these guidelines are excellent programs for recycling office and corrugated paper waste through source separation. These guidelines for Federal Agencies should be adopted by the county for all governmental agencies within the county where the county has the power to impose them.

E. Corrections in Data in Plan

Page V-35. Berkeley has separate collection of newspapers that has been in operation 2-1/2 years, and a pilot program for pickup of glass, cans and newspapers.

Page VI-68. While 7-1/2% of the newsprint made in the United States is made from old newspapers, 19% of the newsprint used is recycled into ALL grades of paper. (Paper, paperboard, and woodpulp capacity, 1970-73. American Paper Institute, 1971, as reprinted in EPA's "Second Annual Report to Congress Resource Recovery and Source Reduction," Table 34, 1974.)

Terry Harrison
Commissioner

Appendix A

Mechanical Resource Recovery Estimates

From Table V-7 and Table V-5

<u>Material</u>	<u>Total Generation Tons/Year</u>	<u>Recoverable Tons/Year</u>	<u>Value \$ Ton</u>	<u>Value \$ Million</u>
Ferrous Metal	43,300	41,200	10	\$0.41
Nonferrous Metal	5,420	3,790	300	1.14
Glass	54,200	34,700	8	0.27
Newspapers	48,800	4,880	1	0.05
Corrugated Cardboard	119,200	11,920	1	0.12
Total	270,900	96,400		\$1.99

Potential Resource Recovery

Estimated Through Separate Collection

<u>Recoverable Tons/Year</u>	<u>Value \$ Ton</u>	<u>Value \$ Million</u>
10,900	20	\$0.22
2,700	300	0.81
27,100	22	0.60
24,400	16	0.39
59,600	20	1.19
124,700		\$3.21

APPENDIX B

The Solid Waste Management Plan for Alameda County is a useful document. It establishes sound and comprehensive guide lines for reworking the current system of waste management, defines the possible alternative methods and systems for managing wastes, and gives a modest push toward turning the plan into action by recommending an agency whose job it is to act. Since so much material had to be assembled, organized, and agreed upon in a relatively short time, it is not surprising to find a number of internal inconsistencies. The following comments are essentially limited to the internal coherence or logic of the document.

The categories of criticism in the suggested revisions are style, consistency, factual error, possible error, information omitted, and material omitted and are indicated by initials in the text. They are not a fundamental criticism but only point out (usually minor) ways in which the plan has failed to do what it sets out to do in presenting a topic. The more important points are starred.

The Bay Delta Project, for example, is included in some of the lists of alternative systems and excluded from others. The account in the plan of that system or of the method on which it is based, composting, is much weaker than the account of other systems or methods. These discrepancies should be rectified.

These suggested revisions do not add to or change the policy of the plan or the plan's structure in any way. In one case the revisions do suggest altering a finding. The figures for the waste generated in the City of Berkeley, and the economics of its collection rates and costs are apparently inaccurate.

Although it is beyond the scope of this criticism, I strongly suggest revising the summaries. They need to be clearer and, in certain respects, to reflect more accurately the substance of the plan.

Page I-4

Paragraph 3, sentence 1. Reference of pronoun "this" unclear. SUBSTITUTE "alternative 1980-B" for "this" in line 1, and delete "1980-B" in line 2. (S.)

Page I-5

Chart, Alternative Systems. Add 1990 A2 from Section V for consistency. (C.)

Page I-6

Chart, Cost Estimates. Add 1990 A2 from Section V for consistency. Account should be given of how the cost estimates were arrived at. The estimates for 1980 A and B, for example, are very puzzling. The length of time assumed for amortization could make the capital costs vary greatly. Are the amortization periods consistent? (C.)

Page I-8

Delete "as drafted by the Joint Refuse Rate Committee," since the model ordinance as characterized by Jennings Smith will probably prove unacceptable. (F.E.)

Appendix B

Page 11-15

Table, Waste Generation.

Figures for Berkeley are wrong. Last year's calculations show that no more than 60% of material disposed of in Berkeley dumps is generated in Berkeley. Please revise. This will entail revision of a number of other figures in this report.

Similar errors for waste generated in Berkeley - II-32, V-39, and V-40. Accurate figure for municipally collected Berkeley refuse on page II-36 - 37,900 tpy. I suggest adding the information that 40% of refuse disposed of in the Berkeley "landfill" comes from outside Berkeley at the end of the first paragraph on II-51. (F.E.)

Page II-31

Litter: Add to "Information is not available on cost involved with attempts to apprehend or locate violators" the phrase ", or on number of attempts." (M.O.)

Page II-48

Paragraph 3. What is the composition of the waste used as "topsoil cover," and what form is it in? (I.O.)

Page II-51

See above.

Page II-57

Paragraph 3, last three sentences. If the areas of concern overlap, this should be mentioned. If they do not, this also should be pointed out. Do the use permits impose conditions involving health and sanitation? (I.O.)

Page II-60

The public collection system of Berkeley also operates on a "task day." When the crews are finished working their routes, they leave. (F.E.)

*Page II-61

An at least partial, or roughly estimated account of comparative collection rates, collection costs, and disposal costs, should be clearly available in this section. Even a full account of only one city, where this information is available, will be extremely helpful to other cities.

Some of the material for the comparison is given in VI-28, 29. There are, however, important errors on the costs of Berkeley's municipal system in this section. In 1974, Berkeley made a profit of nearly \$300,000 from its collection rates (net profit over costs, estimating City overhead at 38%), plus a franchise fee from the "landfill" operator. (Source - verbal communication, R. C. Gazlay, Assistant Director of Public Works, July 1975. Mr. Gazlay should be asked to

Appendix B

supply a written statement. Nowhere in this report do I see the important fact that a municipal system has been making a significant profit (18%) from collection. With imposition of a 25% override in 1974-75 to finance a new transfer station, the net return is greater. (F.E., I.O., M.O.)

Page II-67

Paragraph 2. It is important here to mention that the landfills have been given variances. (I.O.)

*Pages II-49 to 72

It is critically important to mention in this section that the landfills are all filling--and therefore destroying--tidelands, marshes, and canyons. Could be placed with summary discussion on pp II-70, 71, 72.

As it is, this section is totally unrelated to a geophysical description of the county or to environmental parameters. (M.O.)

Page II-69

Paragraph 2, sentence 2. Garbled or a typo. (S.)

Pages II-70, 71, 72

This section would be much more clear and effective if the summary discussion were placed at the beginning. It tells us the principles that the detailed descriptions would then bear out. (S.)

Page II-75

Paragraph 1, re pyrolysis of digested sewage sludge. "It would contribute little to the output" is unnecessarily vague. "There is no net energy gain from the material" is more accurate. (S.)

Paragraph 2. A more accurate characterization of the Bay Delta Project would come from adding "with ultimate expansion to an area-wide system" to the last sentence. *I.O.)

*Page IV-16

Category C. Vegetation/Habitat Modification is the only category that implies or mentions the general social and aesthetic disamenity of placing a "landfill" in formerly pleasant surroundings. It is therefore very important, and should be made clearer and stronger.

Suggested revision:

"In addition, changes on the site or its vicinity might have adverse effects on the following conditions".

1) Leave out "proximal".

Appendix B

New Item 6). Greenbelt areas valuable for recreational, panoramic, or agricultural reasons, and a relief from urban and suburban development.

Without the addition of 6), environmental criteria for placing landfills become almost exclusively utilization. Item 6) adduces the simple and cogent reasons for preservation of open space in the Master Plan. (S.)

Page V-1

Paragraph 1, sentence 2. Delete "cost to the consumer." Add "out-of-pocket cost." (S.)

*Page V-2 ff

This series, which includes "collection systems," and "source separation and recycling," should certainly include the topic "source reduction." (M.O.)

Page V-6 ff

The phrase "materials recovery" is not used consistently in this report. Materials recovery as distinguished from energy recovery includes the material of compost or soil amendment. This is the sense in which it is used on pages V-41, 44, 44a and VI-30 (sentences 3 and 4).

On Pages V-6 ff, however, materials recovery means the narrower sense of front-end recovery of materials. When the narrower sense of the term is intended, the proper qualifying term must be added. Here, therefore, "front-end materials recovery" is what is intended and what should be written. Other examples in the text where "materials recovery" should be written "front-end materials recovery" are on Page VI-13 MATERIALS RECOVERY COSTS (FRONT-END), and on Page VI-30, "Systems 1980 A and 1980 C are basically front-end materials and energy recovery systems." (S.)

Page V-13

Paragraph 1. This sentence is very unfair to the Bay Delta Project. Following the sentence there should be a sentence pointing out that this product bypasses the market or finds its market in the public sector. (Example: "The Bay Delta Project proposed for the bay region, however, bypasses the market. The material would be handled and placed by the state and federal governments." (M.O.)

Page V-15

Paragraph 5. All recovered resources compete in the market place except for the compost production of the Bay Delta System, which at this point is concerned as a non-reimbursable public expense.

In Paragraph 2, Page V-16, therefore, the first sentence should also be changed by the insertion of the word "generally" between "must" and "be." (M.O.)

*Page V-27

This page from a publicity flyer is woefully inaccurate as a description or

Appendix B

summary of the composting process. I am sure it is placed here because of the constraint of time, and that it will be replaced by a summary that is in fact "adopted from the Bay Delta Project Report" as indicated in the footnote. Although this is probably the management design most fully worked out for the Bay Area, it is the least fully and specifically described in the Alameda County Solid Waste Management Plan. (M.O.)

Page V-28

The Bay Delta Plan began as a project of SPUR. It is now a project of the Association of Bay Area Governments. (F.E.)

Page V-36

It should be made clear in mentioning the Bay Delta Plan that 1) one aspect is a demonstration project--2) a full scale project for the total area. In 1), the 44.1% residue would indeed be handled at an Oakland Scavenger site. In the full scale project complementary systems would recover as resources a much larger proportion of refuse. (F.E.)

Pages V-39 and V-40

Error in amount of refuse collected in Berkeley (see above for II-51). F.E.)

Page V-44a

As discussed at an Alameda County Solid Waste Management Commission meeting, the figure for percent recovered in this table should be over 90 rather than 65%. (F.E.)

*Page V-55

By the alternatives presented in this report the very important second sentence in paragraph 4 is FLATLY WRONG. A system involving composting, by the figures in this report could also achieve the State SWM Board's goal of 25% reduction in landfill by 1980.

Personally, I think that expanded recycling, suitable on a community level, plus a strong thrust toward source reduction could also result easily in a merely 25% reduction. (F.E.)

*Page VI-2 ff

Here is a list from which composting has been illogically deleted. The list should read "a. Collection; b. Transfer Station; c. Materials recovery (front end); d. Compost recovery; e. Energy recovery."

Part of the problem is again with the term "materials recovery." (C.)

Page VI-19

Since use of the land at the Davis Street site for this purpose is controversial, it would be very helpful to have an estimate of the area required--for the

Appendix B

station and for the power plant--or at least what percentage of the total area requirements is represented by the power plant. (M.O.)

Page VI-29

Sentence 2. As explained in note for II-61, this is an error for the City of Berkeley, since for many years the City has been funding other projects from its collection and disposal system. (F.E.)

Page VI-30

According to data from the Bay Delta consultant, Bay Delta operating costs are very close to energy recovery operating costs. I think therefore that this figure should be checked. Of course, whether or not you count transfer and placement of the compost as operating costs makes a big difference in the Bay Delta proposal. These are not a local operating cost. (P.E.)

Figure VI-3. Berkeley's figures will again be off due to fault in volume estimate, although this should not make a difference in cost per ton figure. Why is there no credit for materials recovery for Berkeley? (P.E.)

Page VI-32

Figure VI 2. Since the Berkeley generation/collection figures are so inaccurate, I assume the figures given for Berkeley annual operating costs should be checked for accuracy. (P.E.)

*Page VI-36

Where is chart for 1990 A2? (C.)

Page VI-31 ff

Wouldn't it be desirable to put the tables which describe the process or systems (V 40 ff) and the tables which describe the costs of those systems adjacent to each other in this report? (S.)

Page VI-46

"c. Materials Recovery (front-end)" (S.)

Page VI-68

NCCEI and the Sierra Club held a seminar on recycled paper in 1972. In addition to assertions by Garden State that in the key aspects of tear strength their product was superior to paper from virgin pulp, no one was able to tell the difference between virgin and recycled newsprint. The criticisms of publishers was on consistency of supply, not on quality. Virgin pulp for newsprint costs \$162 per ton and recycled pulp cost \$153 per ton. I question the statement in this report that wood pulp is usually cheaper and produces a better paper. (P.E.)

*Page VII-13

City Policies and Plans: In 1972 the City of Berkeley appointed a Solid Waste

Appendix B

Management Commission with the express mandate to work out an environmentally sound alternative to the current system of land disposal, and to coordinate this system with regional plans. In 1975 the City Council placed an override on the refuse collection rates in order to develop adequate funds for a new system, and purchased acreage for a transfer station. In 1974-75 the Council commissioned a preliminary systems feasibility for the City. In other words--Berkeley has definite, well-advanced and well-funded policies and plans. (F.E.)

Page VIII-2

Under Resource Consideration, #2. Delete the second sentence as recommended by Oakland Scavengers, and add to the first sentence, "since it wastes both material resources and land." (S.)

#3, first sentence. "Centralization would facilitate operational control and some opportunities for resource recovery." (C.)

#5. I remember discussing contingency plans, and agreeing that a better phrasing was "to insure...disposal capacity." not to be as specific as land disposal capacity." See VII-26, first task, where it is correctly phrased. (C.)

Page VIII-7

Findings #2 and 3 could be more clearly phrased. (S.)

Page VIII-10

#6 under Legis, "Policies Needed" is badly out of place. It belongs as #2. The ff. wording would be an improvement. New #2: Establish regulations requiring or encouraging the production of containers and certain other manufactured articles in standard size and shape. (S.)

Page VIII-12

Under Findings-Recycling Centers "Source separation provides a cleaner, purer, and often more valuable product." The increase in value is the essential point. (M.O.)

Page VIII-9-21

Again, compost recovery has been illogically omitted from this list of recoverable matter.

Add "Compost Recovery" after "Energy Recovery." Either I, or a member of the Bay Delta Staff would be delighted to elaborate a short list of comments comparable to the comments for the other items. (M.O.)

Page VIII-21

Policy Recommendations, #2. This is a statement with which I heartily agree. It should be backed up somewhere in the report (M.O.)

Page VIII-22

Is Source Generation a typo for Source Separation? Glass should be added to the list as a third item, since clean, color separated glass is economically recyable. (S., M.O.)

Appendix B

Page VIII-26

Task #11. To list resource recovery and energy recovery is redundant, since energy is a resource. Task should read either just resource recovery, or materials and energy recovery. (S.)

Page VIII-27

Under Resource Recovery - Short Term: Soil amendment or compost recovery is also being evaluated. (M.O.)

Mid Term: Again this report uses the phrase materials recovery to mean front-end materials recovery. Add qualifying phrase "front'end." (S.)

Add sentence: Empirical study of Bay Delta system will determine feasibility of compost recovery. (M.O.)

Long Range: See note to P. 26. Use either resource recovery or materials and energy recovery. (S.)

Last Task: It is more than likely there will be more than one transfer station. Write as transfer station or stations. (S.)

Ariel Parkinson
President Pro Tem



State of California

GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814

EDMUND G. BROWN JR.
GOVERNOR

November 18, 1975

Mr. Ron Eggers
Alameda County Planning
Commission
399 Elmhurst Street
Hayward, CA 94544

Dear Mr. Eggers:

SUBJECT: SCH# 75090828 - Solid Waste Management Plan

In a letter to you dated 11-14-75, the State Clearinghouse verified your compliance with the review procedures contained in the State Guidelines for Implementation of the California Environmental Quality Act. The attached comments were transmitted to the Clearinghouse at a latter date. Please respond to them as required.

Sincerely,

William G. Kirkham
Management Systems Officer
State Clearinghouse

WGK/mcd
Attachments

cc: Mary Schell, State Library
Revan A.F. Tranter, ABAG
T.E. Bailey, SWRCB
Harmon Wong-Woo, ARB
Albert A. Marino, SSWMB
James P. Tryner, DP&R

RECEIVED
NOV 19 1975
ALAMEDA COUNTY
PLANNING DEPARTMENT

Memorandum

To : Mr. L. Frank Goodson
Projects Coordinator
The Resources Agency
Resources Building, 13th Floor

Date: OCT 21 1975

In Reply Refer
To: 420:GH

From : STATE WATER RESOURCES CONTROL BOARD
DIVISION OF PLANNING AND RESEARCH

Subject: REVIEW OF NOTICE OF INTENT SCH 75090828
Solid Waste Management Plan, Alameda County

The draft plan and the associated EIR are broad conceptual documents and as such do not address the details of immediate and short-term acute problems associated with waste disposal in Alameda County. Appendix A, which is stated to contain detailed reports on existing waste disposal sites, was not circulated for review.

As previously commented by the California Regional Water Quality Control Board, San Francisco Bay Region, the selection and critical review of an adequate number of Class I and II sites are important to successful management of present and anticipated solid waste disposal problems. Regulation of land disposal sites by a single county agency is needed, with particular attention being given to the restriction of toxic waste disposal to safe, well-managed sites. Mitigation measures at each existing site for control of Bay water intrusion, percolation of leachate to groundwater, and runoff should be investigated and described.

The plan and the associated EIR do not present adequate solutions to the existing solid waste management problems of the County. Class I sites are near capacity and alternative designated sites do not exist within a reasonable distance of major sources within the County. Class I wastes are being deposited in inadequately protected locations. Existing Class II sites have little remaining capacity and attempts to designate other sites have so far been unsuccessful. If these problems remain unsolved, the plan will not accomplish its goals and serious environmental impacts will continue. The section on alternatives should discuss the vulnerability of plan goals to unresolved specific problems and the consequences of incomplete implementation of the plan. If export of solid wastes is undertaken, the EIR should discuss the environmental impact of the transportation program and of the out-of-county disposal sites. The State and Regional Boards are concerned with the interim impacts of solid waste disposal on water quality as well as the impacts of the final solution envisaged by the completed plan. Accordingly, it is recommended that specific schedules for implementation of plan elements and specific descriptions of necessary actions be incorporated in the plan or adopted and circulated as part of supplementary documents.

OCT 21 1975

The following specific changes are requested to clarify the description of the roles and responsibilities of the State and Regional Boards and the present status of solid waste disposal problems.

Page 11-71, 3rd paragraph delete last sentence and add to end.

....The Regional Water Quality Control Board is in the process of updating all discharge requirements on disposal sites. These requirements include comprehensive self-monitoring programs to evaluate the effect of the disposal operations on water quality. Those sites found to be polluting water will be ordered to clean up and abate all adverse effects.

Page VII-3

Water Resources Control Board

Add the following paragraph:

The State Board establishes minimum requirements for construction, operating procedures, and closure of solid and liquid waste disposal sites including wastes generated by composting, resource recovery, pyrolysis, and incineration. These requirements are published by the State Board in "Waste Discharge Requirements for Waste Disposal to Land...Disposal Site Design and Operation Information" dated March 1975.

Page VIII-7, Findings.

Add to 1. Figures for the amount of Group 1 waste generated, the quantities exported from the County, and the amount received at local disposal sites.

Page VIII-15. Add after 2 in Findings.

The Regional Water Quality Control Board establishes minimum standards for waste disposal to land with site design and operation procedures for protection of water quality and prevention of public maintenance.

Page VIII-19. Add to state and regional level.

The State should encourage the development of source control with reduction in quantities of toxics and hazardous wastes.

Page VIII-22. Findings.

1. ...disposal. These disposal sites are at or near capacity with no new sites being planned at this time.



THOMAS E. BAILEY, Acting Chief
Division of Planning and Research

Memorandum

To : Mr. Ken Fellows
Senior Engineer
Department of Water Resources
Room 252-32
1416 Ninth Street
Sacramento, CA 95814

Date : November 10, 1975

Subject: Preliminary Draft of
the Solid Waste Management
Plan and Draft Environmental
Report for Alameda County

From : Air Resources Board
Harmon Wong-Woo, Chief
Division of Implementation & Enforcement

The Following are our comments on the preliminary draft of the Solid Waste Management Plan and draft environmental report for Alameda County:

I. Section I-D, Developments in Waste Management, page 1-4

Paragraph 2: This paragraph discusses examples of energy recovery.

Comment: There is no discussion of emissions in this Section. It is suggested that a line be inserted after "...significantly." as follows:
These costs would include the costs of control equipment for maintaining the emissions of pollutants at the levels required by control agencies.

II. Section V-D-1, Resource Recovery Processes, Page V-16

Paragraph 2: This paragraph gives an overview of technology and costs.

Comment: Insert "which includes pollution control equipment," after the word "...investment,"

III. Section VII-B-2, Air Resources Board, page VII-2

Comment: The number of air basins have recently been changed to 13.

IV. Section VIII, Plan Policies and Implementation Program, page VIII-2

Findings - General, Item 17:

Comment: It is suggested that line 2 be re-written after "...waste disposal facility," as follows: should provide safe disposal of residues, reduce land use and conserve resources. However, these benefits may, although not necessarily, be offset by the generation of air and water pollutants from thermal conversion alternatives to land filling only.

V. Section VIII-A-III, To Preserve and Maintain a High Quality Environment,
page VIII-15

Findings, Item 5

Comment: This paragraph is too general. Strike out the first two sentences and insert: The coordination of efforts of the solid waste management, water quality control and air pollution control agencies is essential to the successful implementation of control strategies for waste recovery processes to produce heat, fuels and recyclables.

VI. Section IX, Draft Environmental Report, page IX-7

Item F-5, Irreversible - Environmental Changes:

This item discusses the changing character of pollutants as a result of the design of new processes for waste recovery.

Comment: The prediction of emissions from proposed equipment is possible in the early design stages. The weight rates of pollutants can be predicted from a knowledge of thermal waste conversion processes. Pilot plant data, control equipment design, and process data together with information on emission standards are required.

cc: W. Lockett

Memorandum

To : Honorable Claire T. Dedrick
Secretary for Resources
Resources Agency
1416 Ninth Street, Room 1311
Sacramento, CA 95814

Date : October 10, 1975

From : STATE SOLID WASTE MANAGEMENT BOARD

Subject: SCH 75090828, Draft EIR, Alameda County Solid Waste Management Plan

We have reviewed the subject draft EIR and have the following comments:

Page IX-3

Regional Coordination. The Board is conducting a San Francisco Bay Area Solid Waste Management and Resource Recovery Study which will provide all Bay Area Counties the opportunity to coordinate waste management activities on a regional basis. The final EIR should include a discussion of this study and its potential impact on Alameda County.

Page IX-1&5

We suggest that references to the "short and long-term" programs be amended to include the medium-term (1980-1990) planning period, in order to conform to the requirements of the Planning Guidelines for the Preparation of Solid Waste Management Plans.

Page IX-5

It should be noted that plan approval by the cities must meet two criteria: (1) approval by a majority of the cities within the county and, (2) approval by a sufficient number of cities to represent the majority of the incorporated population.

We assume that the plan addresses those constraints listed on this page specify actions required to minimize their effects on plan implementation. The final EIR should state that such consideration has been given.

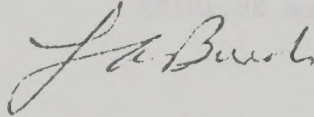
Page IX-7

We agree that the impacts of proposed facilities may not be determined until such time as they are being proposed for construction and recommend that the final EIR state that it may not be used to exempt such proposed facilities from further detailed environmental assessment.

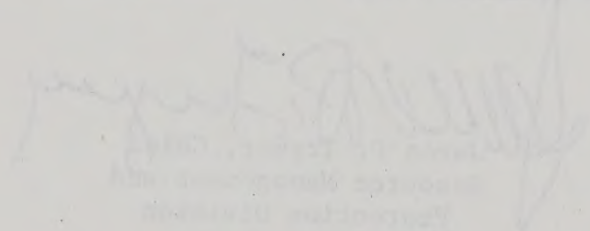
Page IX-8, first paragraph

It should be stated that mitigation measures will be required.

We appreciate the opportunity to comment on the subject EIR. If you have any questions, please contact us.



-s- Albert A. Marino
Executive Officer



Memorandum

To : Mr. Charles K. Fellows
Department of Water Resources
Room 252-32, Resources Building

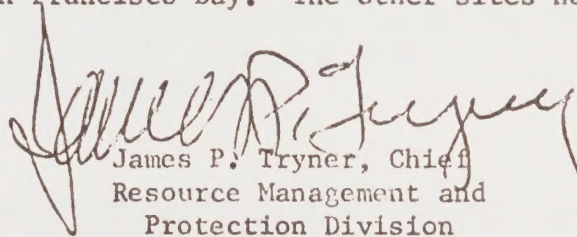
Date : October 8, 1975

Subject : Sch No. 75090828
Preliminary Draft
Solid Waste Management
Plan and Draft EIR
for Alameda County

From : Department of Parks and Recreation

The Department of Parks and Recreation reviewed subject report and has no major disagreements with the Plan and EIR. We note that no specific closing date is stated for the Alameda City Disposal site as mentioned on page 11-51. This site is on the opposite side of San Leandro Channel from Robert N. Crown Memorial State Beach. This beach is owned by the Department of Parks and Recreation and operated by the East Bay Regional Park District.

The Department of Parks and Recreation urges the closing of this particular Dump as well as other sites which affect the recreation opportunities, natural environment and aesthetic values of San Francisco Bay. The other sites have more definite closing dates.


James P. Tryner, Chief
Resource Management and
Protection Division

U.C. BERKELEY LIBRARIES



C124900636

